

**Source Property Information**BRRTS #: ACTIVITY NAME: PROPERTY ADDRESS: MUNICIPALITY: PARCEL ID #: CLOSURE DATE: FID #: DATCP #: PECFA#: **\*WTM COORDINATES:**X:  Y: *\* Coordinates are in  
WTM83, NAD83 (1991)***WTM COORDINATES REPRESENT:** Approximate Center Of Contaminant Source Approximate Source Parcel Center**Please check as appropriate:** (BRRTS Action Code)**Contaminated Media:** Groundwater Contamination > ES (236) Contamination in ROW Off-Source Contamination*(note: for list of off-source properties  
see "Impacted Off-Source Property" form)* Soil Contamination > \*RCL or \*\*SSRCL (232) Contamination in ROW Off-Source Contamination*(note: for list of off-source properties  
see "Impacted Off-Source Property" form)***Land Use Controls:** N/A (Not Applicable) Soil: maintain industrial zoning (220)*(note: soil contamination concentrations  
between non-industrial and industrial levels)* Structural Impediment (224) Site Specific Condition (228) Cover or Barrier (222)*(note: maintenance plan for  
groundwater or direct contact)* Vapor Mitigation (226) Maintain Liability Exemption (230)*(note: local government unit or economic  
development corporation was directed to  
take a response action)***Monitoring Wells:**

Are all monitoring wells properly abandoned per NR 141? (234)

 Yes  No  N/A*\* Residual Contaminant Level**\*\*Site Specific Residual Contaminant Level*

This Adobe Fillable form is intended to provide a list of information that is required for evaluation for case closure. It is to be used in conjunction with Form 4400-202, Case Closure Request. The closure of a case means that the Department has determined that no further response is required at that time based on the information that has been submitted to the Department.

**NOTICE: Completion of this form is mandatory** for applications for case closure pursuant to ch. 292, Wis. Stats. and ch. NR 726, Wis. Adm. Code, including cases closed under ch. NR 746 and ch. NR 726. The Department will not consider, or act upon your application, unless all applicable sections are completed on this form and the closure fee and any other applicable fees, required under ch. NR 749, Wis. Adm. Code, Table 1 are included. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than reviewing closure requests and determining the need for additional response action. The Department may provide this information to requesters as required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

BRRTS #:  (No Dashes) PARCEL ID #:   
ACTIVITY NAME:  WTM COORDINATES: X:  Y:

**CLOSURE DOCUMENTS** (the Department adds these items to the final GIS packet for posting on the Registry)

- Closure Letter**
- Maintenance Plan** (if activity is closed with a land use limitation or condition (land use control) under s. 292.12, Wis. Stats.)
- Continuing Obligation Cover Letter** (for property owners affected by residual contamination and/or continuing obligations)
- Conditional Closure Letter**
- Certificate of Completion (COC)** (for VPLE sites)

**SOURCE LEGAL DOCUMENTS**

- Deed:** The most recent deed as well as legal descriptions, for the **Source Property** (where the contamination originated). Deeds for other, off-source (off-site) properties are located in the **Notification** section.  
**Note:** If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.
- Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).  
**Figure #:**                      **Title: Survey**
- Signed Statement:** A statement signed by the Responsible Party (RP), which states that he or she believes that the attached legal description accurately describes the correct contaminated property.

**MAPS** (meeting the visual aid requirements of s. NR 716.15(2)(h))

- Maps must be no larger than 11 x 17 inches unless the map is submitted electronically.
- Location Map:** A map outlining all properties within the contaminated site boundaries on a U.S.G.S. topographic map or plat map in sufficient detail to permit easy location of all parcels. If groundwater standards are exceeded, include the location of all potable wells within 1200 feet of the site.  
**Note:** Due to security reasons municipal wells are not identified on GIS Packet maps. However, the locations of these municipal wells must be identified on Case Closure Request maps.  
**Figure #: 1**                      **Title: Site Location Map**
  - Detailed Site Map:** A map that shows all relevant features (buildings, roads, individual property boundaries, contaminant sources, utility lines, monitoring wells and potable wells) within the contaminated area. This map is to show the location of all contaminated public streets, and highway and railroad rights-of-way in relation to the source property and in relation to the boundaries of groundwater contamination exceeding a ch. NR 140 Enforcement Standard (ES), and/or in relation to the boundaries of soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Levels (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.  
**Figure #: 2**                      **Title: Site Layout and Extent of Contamination Map**
  - Soil Contamination Contour Map:** For sites closing with residual soil contamination, this map is to show the location of all contaminated soil and a single contour showing the horizontal extent of each area of contiguous residual soil contamination that exceeds a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL) as determined under s. NR 720.09, 720.11 and 720.19.  
**Figure #: 2**                      **Title: Site Layout and Extent of Contamination Map**

BRRTS #: 02-68-551327

ACTIVITY NAME: BROOKMOUND PLAZA

**MAPS (continued)**

- Geologic Cross-Section Map:** A map showing the source location and vertical extent of residual soil contamination exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL). If groundwater contamination exceeds a ch. NR 140 Enforcement Standard (ES) when closure is requested, show the source location and vertical extent, water table and piezometric elevations, and locations and elevations of geologic units, bedrock and confining units, if any.

**Figure #:**                      **Title:**

**Figure #:**                      **Title:**

- Groundwater Isoconcentration Map:** For sites closing with residual groundwater contamination, this map shows the horizontal extent of all groundwater contamination exceeding a ch. NR140 Preventive Action Limit (PAL) and an Enforcement Standard (ES). Indicate the direction and date of groundwater flow, based on the most recent sampling data.

**Note:** This is intended to show the total area of contaminated groundwater.

**Figure #:**                      **Title:**

- Groundwater Flow Direction Map:** A map that represents groundwater movement at the site. If the flow direction varies by more than 20° over the history of the site, submit 2 groundwater flow maps showing the maximum variation in flow direction.

**Figure #:**                      **Title:**

**Figure #:**                      **Title:**

**TABLES (meeting the requirements of s. NR 716.15(2)(h)(3))**

Tables must be no larger than 11 x 17 inches unless the table is submitted electronically. Tables must not contain shading and/or cross-hatching. The use of **BOLD** or *ITALICS* is acceptable.

- Soil Analytical Table:** A table showing remaining soil contamination with analytical results and collection dates.  
**Note:** This is one table of results for the contaminants of concern. Contaminants of concern are those that were found during the site investigation, that remain after remediation. It may be necessary to create a new table to meet this requirement.

**Table #: 1                      Title: Analytical Quality Results**

- Groundwater Analytical Table:** Table(s) that show the most recent analytical results and collection dates, for all monitoring wells and any potable wells for which samples have been collected.

**Table #:                      Title:**

- Water Level Elevations:** Table(s) that show the previous four (at minimum) water level elevation measurements/dates from all monitoring wells. If present, free product is to be noted on the table.

**Table #:                      Title:**

**IMPROPERLY ABANDONED MONITORING WELLS**

For each monitoring well not properly abandoned according to requirements of s. NR 141.25 include the following documents.

**Note:** If the site is being listed on the GIS Registry for only an improperly abandoned monitoring well you will only need to submit the documents in this section for the GIS Registry Packet.

- Not Applicable**

- Site Location Map:** A map showing all surveyed monitoring wells with specific identification of the monitoring wells which have not been properly abandoned.

**Note:** If the applicable monitoring wells are distinctly identified on the Detailed Site Map this Site Location Map is not needed.

**Figure #:**                      **Title:**

- Well Construction Report:** Form 4440-113A for the applicable monitoring wells.

- Deed:** The most recent deed as well as legal descriptions for each property where a monitoring well was not properly abandoned.

- Notification Letter:** Copy of the notification letter to the affected property owner(s).

BRRTS #: 02-68-551327

ACTIVITY NAME: BROOKMOUND PLAZA

## NOTIFICATIONS

### Source Property

**Not Applicable**

**Letter To Current Source Property Owner:** If the source property is owned by someone other than the person who is applying for case closure, include a copy of the letter notifying the current owner of the source property that case closure has been requested.

**Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying current source property owner.

### Off-Source Property

Group the following information per individual property and label each group according to alphabetic listing on the "Impacted Off-Source Property" attachment.

**Not Applicable**

**Letter To "Off-Source" Property Owners:** Copies of all letters sent by the Responsible Party (RP) to owners of properties with groundwater exceeding an Enforcement Standard (ES), and to owners of properties that will be affected by a land use control under s. 292.12, Wis. Stats.

**Note:** Letters sent to off-source properties regarding residual contamination must contain standard provisions in Appendix A of ch. NR 726.

#### Number of "Off-Source" Letters:

**Return Receipt/Signature Confirmation:** Written proof of date on which confirmation was received for notifying any off-source property owner.

**Deed of "Off-Source" Property:** The most recent deed(s) as well as legal descriptions, for all affected deeded **off-source property(ies)**. This does not apply to right-of-ways.

**Note:** If a property has been purchased with a land contract and the purchaser has not yet received a deed, a copy of the land contract which includes the legal description shall be submitted instead of the most recent deed. If the property has been inherited, written documentation of the property transfer should be submitted along with the most recent deed.

**Certified Survey Map:** A copy of the certified survey map or the relevant section of the recorded plat map for those properties where the legal description in the most recent deed refers to a certified survey map or a recorded plat map. (lots on subdivided or platted property (e.g. lot 2 of xyz subdivision)).

**Figure #:**

**Title:**

**Letter To "Governmental Unit/Right-Of-Way" Owners:** Copies of all letters sent by the Responsible Party (RP) to a city, village, municipality, state agency or any other entity responsible for maintenance of a public street, highway, or railroad right-of-way, within or partially within the contaminated area, for contamination exceeding a groundwater Enforcement Standard (ES) and/or soil exceeding a Residual Contaminant Level (RCL) or a Site Specific Residual Contaminant Level (SSRCL).

#### Number of "Governmental Unit/Right-Of-Way Owner" Letters:



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

Southeast Region Headquarters  
2300 N. Dr. Martin Luther King, Jr. Drive  
Milwaukee, Wisconsin 53212-3128  
FAX 414-263-8606  
Telephone 414-263-8500  
TTY Access via relay - 711

July 3, 2008

Brookmound Plaza, LLC  
Arthur Labros  
17800 W. Bluemound Rd., Suite R  
Brookfield, WI 53045

FID # 268209370  
BRRTS Activity #: 02-68-551327

SUBJECT: Case Closure with Land Use Limitations or Conditions  
Brookmound Plaza, 17780 and 17800 W. Bluemound Rd., Brookfield WI

Dear Mr. Labros:

The Wisconsin Department of Natural Resources (Department) reviewed the above referenced case for closure. The Department reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases.

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

### GIS Registry

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

- Residual soil contamination exists that must be properly managed should it be excavated or removed
- Pavement must be maintained over contaminated soil and the state must approve any changes to this barrier

Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit the RR Sites Map page at <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If your property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://dnr.wi.gov/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

### Closure Conditions

Please be aware that pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. It is the Department's intent to conduct inspections in the future to ensure that the conditions included in this letter including compliance with referenced maintenance plans are met.

#### Cover or Barrier

Pursuant to s. 292.12(2)(a), Wis. Stats., the pavement that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

The attached maintenance plan and inspection log are to be kept up-to-date and the inspection log need only be submitted to the Department upon request.

#### Prohibited Activities

The following activities are prohibited on any portion of the property where pavement is required as shown on the attached map, 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; or 6) construction or placement of a building or other structure.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Mark Drews at 262-574-2146.

Sincerely,



Frances Koonce  
Southeast Remediation & Redevelopment Team Sub-Supervisor

cc: Sigma Environmental Services, Eric Olson, 1300 W. Canal St., Milwaukee, WI 53233  
TFW Group, LLC, Michael Burton, Burton & Davis, LLP, 611 N. Broadway, Suite 335,  
Milwaukee, WI 53202  
SER File

# CAP MAINTENANCE PLAN

Brookmound Plaza  
17780 & 17800 West Bluemound Road  
Brookfield, Wisconsin  
WDNR BRRTS #02-68-551327  
WDNR FID #268209370  
June 2008

## Introduction

This document is the Maintenance Plan for pavement cover at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing paved surface occupying the area over the contaminated soil on-site. The contaminated soil is impacted by Polycyclic Aromatic Hydrocarbons (PAHs), lead and arsenic.

The location of the paved surface to be maintained in accordance with this Maintenance Plan, as well as the impacted soil are identified in the attached map (Exhibit A).

The area of impacted soil exceeding NR 746 Table 2 Direct Contact Soil Contaminant and WDNR Suggested Generic RCLs for Direct Contact for PAHs in soil appears limited to the southern area of the parking lot on the property along Bluemound Road, south of the buildings on the property as shown on Exhibit A.

## Cover and Building Barrier Purpose

The paved surface over the contaminated 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 and future use of the property, the barrier should function as intended unless disturbed.

## Annual Inspection

The paved surfaces and building foundation overlying the contaminated soil and as depicted in Exhibit A 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 to evaluate damage due to:

- Settling of the paved surface
- Exposure to the weather
- Wear from traffic
- Increasing age and other factors

Any area where soils have become or are likely to become exposed must 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 log will include recommendations for necessary repair of any areas 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 sent to the Wisconsin Department of Natural Resources ("WDNR") at least annually after every inspection, unless otherwise directed in the case closure letter.

## 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 operations or they can include 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 reuse (pursuant to Chapter NR 718 regulations regarding the management of excavated solid wastes) or prior to disposal to ascertain if contamination remains if it is intended for a facility other than a special waste or better licensed landfill.

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 paved surface overlying the contaminated soil is removed or replaced, the replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the paved surface, will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

#### 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 WDNR.

#### Contact Information

As of June 2008:

- For site owner and operator information, contact:

TFW Group, LLC  
c/o Mr. Michael R. Burton  
Burton & Davis, LLP  
611 North Broadway, Suite 335  
Milwaukee, WI 53202

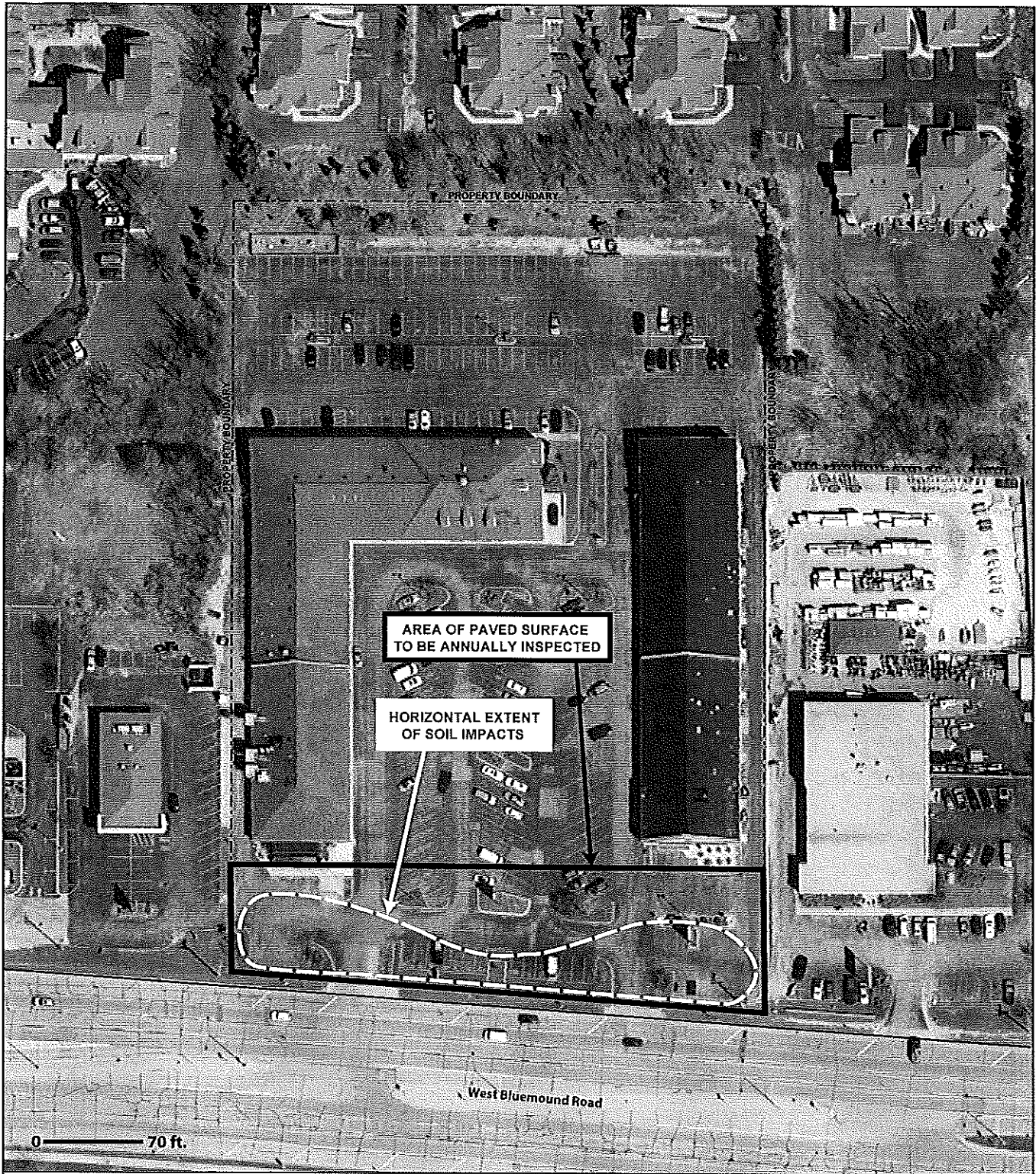
- For environmental consultant information contact:

Sigma Environmental Services, Inc.  
1300 West Canal Street  
Milwaukee, WI 53233  
Telephone: (414) 643-4200  
Fax: (414) 643-4210

- For Wisconsin Department of Natural Resources (WDNR) information contact:

Wisconsin Dept. of Natural Resources  
141 NW Barstow St, Room 180  
Waukesha, WI 53188  
Contact: Mr. Mark Drews  
Telephone: (262) 574-2146  
Fax: (262) 574-2128





CAP MAINTENANCE AREA


[www.thesigmagroup.com](http://www.thesigmagroup.com)  
 1300 West Canal Street  
 Milwaukee, WI 53233  
 Single Source. Sound Solutions. GROUP 414-643-4200

**Site Address:** Brookmound Plaza (WDNR FID #268209370)  
 17780 & 17800 West Bluemound Road  
 Brookfield, Wisconsin  
**Project:** #10801



**Exhibit A**

**Exhibit B**  
**Barrier INSPECTION LOG**

<b>Inspection Date</b>	<b>Inspector</b>	<b>Condition of Cap</b>	<b>Recommendations</b>	<b>Have Recommendations from previous inspection been implemented?</b>

POST  
CLOSURE

State of Wisconsin

DEPARTMENT OF NATURAL RESOURCES  
Waukesha Service Center  
141 NW Barstow St., Room 180  
Waukesha WI 53188

Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 608-266-2621  
Toll Free 1-888-936-7463  
TTY Access via relay - 711



February 13, 2012

TFW Group LLC  
Veer Karri  
17800 W. Bluemound Rd.  
Brookfield, WI 53005

Subject: Updated Cap Maintenance Plan  
Brookmound Plaza, 17780 & 17800 W. Bluemound Rd., Brookfield, WI  
WDNR BRRTS Activity # 02-68-551327, WDNR FID # 268209370

Dear Mr. Karri:

The Wisconsin Department of Natural Resources (Department) received the "Updated Cap Maintenance Plan" reports from Sigma Group on January 11 and February 6, 2012. The Department reviews environmental remediation cases for compliance with state statutes and rules to maintain consistency in the investigation and remediation of these cases.

Based on the information provided in the above report, the Department is approving the site cap inspection on the above site to every other year. The Department will include the update cap maintenance plan on the GIS registry and in its file.

The Department appreciates the cooperation with the investigation of this site. If you have any questions regarding this letter, please contact me at 262-574-2146.

Sincerely,

Mark Drews  
Hydrogeologist  
Remediation & Redevelopment Program

cc: Sigma Group, Adam Roder, 1300 W. Canal St., Milwaukee, WI 53233  
SER File

## CAP MAINTENANCE PLAN

Brookmound Plaza  
17780 & 17800 West Bluemound Road  
Brookfield, Wisconsin  
WDNR BRRTS #02-68-551327  
WDNR FID #268209370  
June 2008  
Revision #1 – December 2011

### Introduction

This document is the Maintenance Plan for pavement cover at the above-referenced property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. The maintenance activities relate to the existing paved surface occupying the area over the contaminated soil on-site. The contaminated soil is impacted by Polycyclic Aromatic Hydrocarbons (PAHs), lead, and arsenic.

The location of the paved surface to be maintained in accordance with this Cap Maintenance Plan, as well as the impacted soil, is identified in the attached map (Exhibit A).

The area of impacted soil exceeding NR 746 Table 2 Direct Contact Soil Contaminant and WDNR Suggested Generic RCLs for Direct Contact for PAHs in soil appears limited to the southern area of the parking lot on the property along W. Bluemound Road, south of the buildings on the property as shown on Exhibit A.

### Cover and Building Barrier Purpose

The paved surface over the contaminated 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 and future use of the property, the barrier should function as intended unless disturbed.

### Biennial Inspection

The paved surfaces and building foundation overlying the contaminated soil and as depicted in Exhibit A will be inspected every other 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 to evaluate damage due to:

- Settling of the paved surface
- Exposure to the weather
- Wear from traffic
- Increasing age and other factors

Any area where soils have become or are likely to become exposed must 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 log will include recommendations for necessary repair of any areas 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 sent to the Wisconsin Department of Natural Resources ("WDNR") after each inspection, unless otherwise directed in the case closure letter or other WDNR correspondence.

### Maintenance Activities

If problems are noted during the inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching and filling operations or they can include 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 reuse (pursuant to Chapter NR 718 regulations regarding the management of excavated solid wastes) or prior to disposal to ascertain if contamination remains if it is intended for a facility other than a special waste or better licensed landfill.

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 paved surface overlying the contaminated soil is removed or replaced, the replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the paved surface, will maintain a copy of this Maintenance Plan on-site and make it available to all interested parties (i.e. on-site employees, contractors, future property owners, etc.) for viewing.

#### **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 WDNR.

#### **Contact Information**

- For site owner / operator information as of June 2008:  
TFW Group, LLC  
c/o Mr. Michael R. Burton  
Burton & Davis, LLP  
611 North Broadway, Suite 335  
Milwaukee, WI 53202
  
- Site owner / operator as of 2010:  
TFW Group, LLC  
c/o Mr. Veer Karri  
17800 W. Bluemound Road  
Brookfield, WI 53045
  
- Environmental consultant:  
Sigma Environmental Services, Inc.  
1300 W. Canal Street  
Milwaukee, WI 53233  
Contact: Mr. Adam J. Roder, P.E.  
Telephone: (414) 643-4200  
Fax: (414) 643-4210
  
- Wisconsin Department of Natural Resources:  
Wisconsin Department of Natural Resources  
141 NW Barstow St, Room 180  
Waukesha, WI 53188  
Contact: Mr. Mark Drews  
Telephone: (262) 574-2146  
Fax: (262) 574-2128



CAP MAINTENANCE AREA

THE **SIGMA** GROUP [www.thesigmagroup.com](http://www.thesigmagroup.com)  
1300 West Canal Street  
Milwaukee, WI 53233  
Single Source. Sound Solutions. 414-643-4200

**Site Address:** Brookmound Plaza (WDNR FID #268209370)  
17780 & 17800 West Bluemound Road  
Brookfield, Wisconsin  
**Project:** #10801



**Exhibit A**

**Exhibit B**  
**Barrier INSPECTION LOG**

<b>Inspection Date</b>	<b>Inspector</b>	<b>Condition of Cap</b>	<b>Recommendations</b>	<b>Have Recommendations from previous inspection been implemented?</b>



002064 NOV 29 05

STATE BAR OF WISCONSIN FORM 3 - 2000  
QUIT CLAIM DEED

3341618

REGISTER'S OFFICE  
WAUKESHA COUNTY, WI  
RECORDED ON

11-29-2005 3:22 PM

MICHAEL J. HASSELINGER  
REGISTER OF DEEDS

REC. FEE: 4.00  
REC. FEE-CO: 5.00  
REC. FEE-ST: 2.00  
TRAN. FEE:  
TRAN. FEE-STATE:  
PAGES: 1

The Labros Company, Inc., a Wisconsin  
This Deed, made between Globe Corporation; Arthur Labros,  
Trustee of Arthur Labros Revocable Trust of July 30, 1997  
and Thomas C. Pagadas, Trustee of the Pagadas Family  
Revocable Trust of March 6, 1990 Grantor,  
and Brookmound Plaza LLC

Grantee,  
Grantor quit claims to Grantee the following described real estate in  
Waukesha County, State of Wisconsin (if more space is needed,  
please attach addendum):

Lots 1 and 2 of Certified Survey Map No. 6204 recorded  
June 22, 1990 in the office of the Register of Deeds for  
Waukesha County, Wisconsin in Volume 51 of Certified  
Survey Maps on Pages 124, 125, 126 and 127 inclusive, as  
Document No. 1599041, being a part of the NW 1/4 of the  
SE 1/4 of Section 28, Township 7 North, Range 20 East,  
Town of Brookfield, Waukesha County, Wisconsin.

Name and Return Address

Attorney Arthur Labros  
17800 W Bluemound Road Ste R  
Brookfield, WI 53045

BKFT 1120 995 001  
BKFT 1120 995 002  
Parcel Identification Number (PIN)

This is not homestead property.  
(is) (is not)

FEE  
# 7.05 (6 d)  
EXEMPT

Together with all appurtenant rights, title and interests.

Dated this 29<sup>th</sup> day of November, 2005

The Labros Company, Inc. (SEAL)  
\* Arthur Labros, President

(SEAL)  
\* Arthur Labros, Trustee of Arthur Labros  
Revocable Trust of July 30, 1997

(SEAL)  
\* Thomas C. Pagadas, Trustee of the Pagadas  
Family Revocable Trust of March 6, 1990  
\* (SEAL)

ACKNOWLEDGMENT

State of Wisconsin.

Waukesha County, Wis.  
Personally came before me this 29<sup>th</sup> day of  
November, 2005, the above named  
Arthur Labros, President; Arthur Labros  
and Thomas C. Pagadas

to me known to be the persons  
instrument and acknowledge the same.

Sandra L. Danko  
Notary Public, State of Wisconsin  
My commission is permanent. (If not, state expiration date:  
October)

Signature(s) \_\_\_\_\_  
authenticated this \_\_\_\_\_ day of \_\_\_\_\_

TITLE: MEMBER STATE BAR OF WISCONSIN  
(If not, \_\_\_\_\_  
authorized by §706.06, Wis. Stats.)

THIS INSTRUMENT WAS DRAFTED BY

Attorney Arthur Labros  
State Bar No. 1007662  
(Signatures may be authenticated or acknowledged. Both are not necessary.)

\* Names of persons signing in any capacity must be typed or printed below their signature.






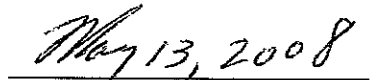
## Statement by Responsible Party

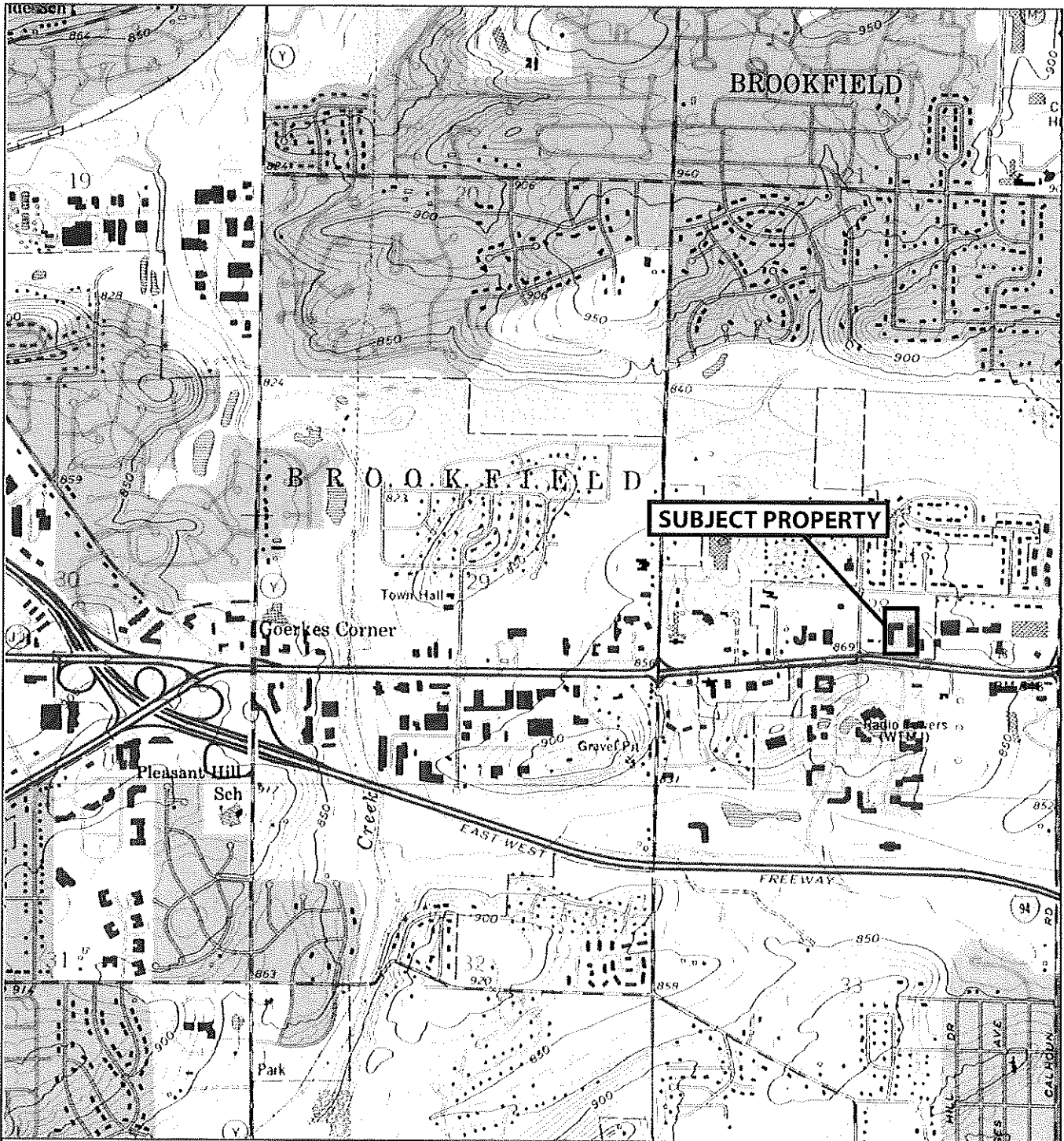
Brookmound Plaza  
17780 & 17800 West Bluemound Road  
Brookfield, Wisconsin

FID #268209370  
BRRTS# 02-68551327

Brookmound Plaza LLC, the responsible party for the 17780 & 17800 West Bluemound Road property located in Brookfield, Wisconsin, states that the legal description provided to the Wisconsin Department of Natural Resources (and attached to this statement) is complete and accurate to the best of our knowledge.

  
Signature of Representative for Responsible Party:  
Arthur Labros, Member

  
Date: May 13, 2008



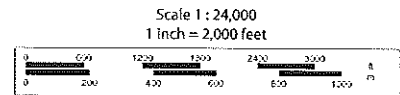
NW 1/4 of the SE 1/4, Section 28, T7N, R20E, USGS Waukesha Quadrangle (1959, photorevised 1994)

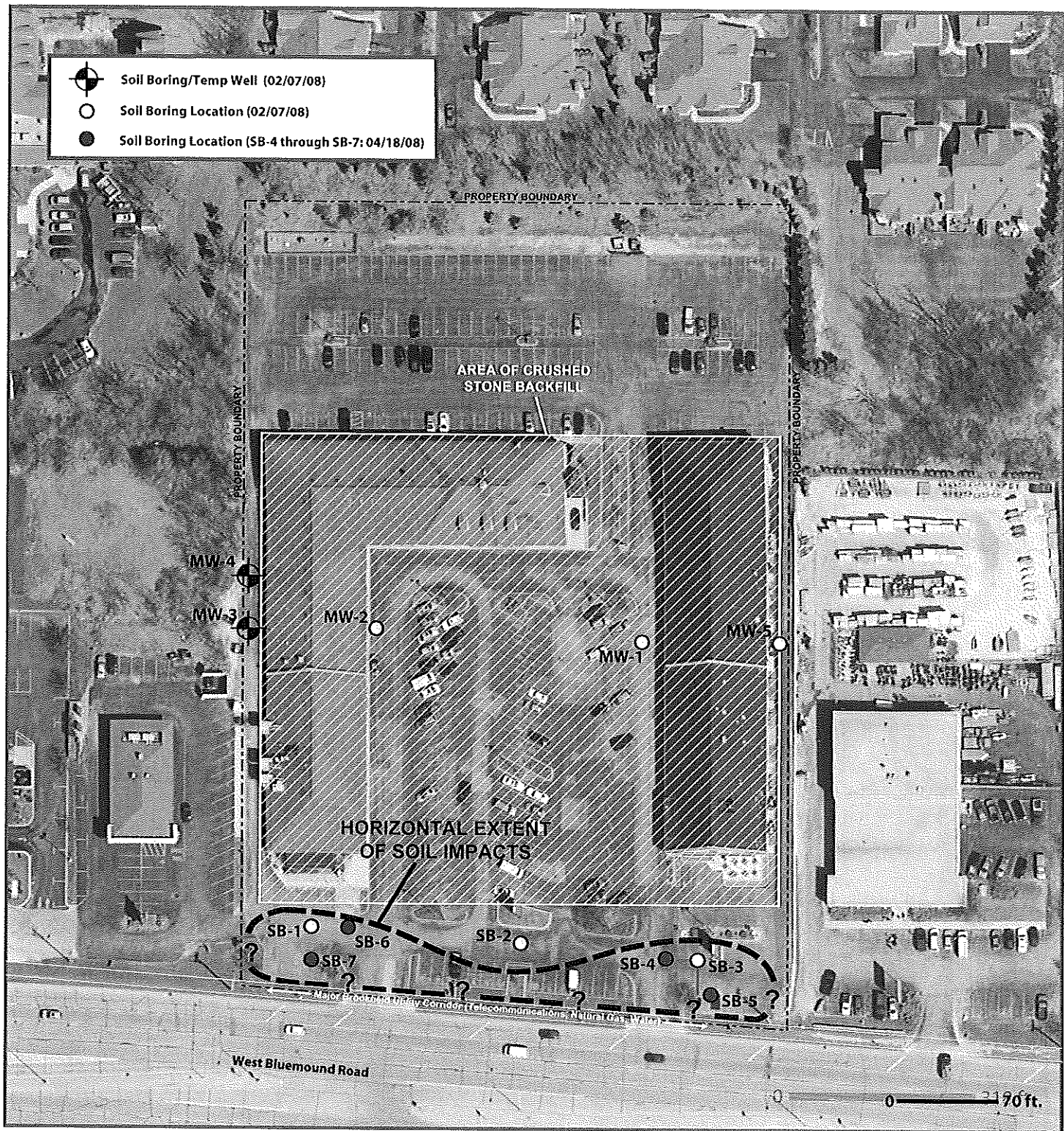
Site/Client: Brookmound Plaza  
 Address: 17780 & 17800 West Bluemound Road  
 Brookfield, Wisconsin  
 Project: #10979

**FIGURE 1**  
 SITE LOCATION MAP

**THE SIGMA GROUP**  
 Single Source. Sound Solutions.

www.thesigmagroup.com  
 1300 West Canal Street  
 Milwaukee, WI 53233  
 414-643-4200





**Client:** Brookmound Plaza, LLC

**Site Address:** 17780 & 17800 West Bluemound Road  
Brookfield, WI 53045

**Project:** #10979

THE **SIGMA** GROUP  
 www.thesigmagroup.com  
 1800 West Canal Street  
 Milwaukee, WI 53233  
 Single Source. Sound Solutions. 414-643-4200



**FIGURE 2**  
 Site Layout and  
 Extent of Contamination Map

**TABLE 1**

**SOIL – Analytical Quality Results**

**RCRA Metals & Polynuclear Aromatic Hydrocarbons (PAHs)**

**Brookmound Plaza (17780 & 17800 West Bluemound Road, Brookfield, WI)**

**Project Reference: #10979**

Soil Boring Identification:				SB-1	SB-2	SB-3	SB-4		SB-5		SB-6		SB-7			
Sample Depth (ft):				8-12'	4-8'	12-18'	2-4'	16-20'	3-4'	14-16'	3.25-4'	12-14'	1-3.5'	14-18'		
PID / FID				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
Parameter	Unit	Regulatory Standard		Collection Date												
		Chapter NR 720 RCL Table 2 Values		02/07/08	02/07/08	02/07/08	04/18/08	04/18/08	04/18/08	04/18/08	04/18/08	04/18/08	04/18/08	04/18/08	04/18/08	
		Non-Industrial	Industrial													
<b>RCRA Metals</b>																
Arsenic	mg/kg	0.04	1.5	<b>2.4</b>	<b>0.95 "J"</b>	<b>0.82 "J"</b>	<b>3.5</b>	<0.4	<b>2.8</b>	<0.4	<b>2.1</b>	<b>1.0</b>	<b>0.93 "J"</b>	<0.4		
Barium	mg/kg	NS	NS	<b>41</b>	<b>70</b>	<b>27</b>	NA	NA	NA	NA	NA	NA	NA	NA		
Cadmium	mg/kg	8.0	510	<b>0.92</b>	<b>0.74</b>	<b>0.81</b>	NA	NA	NA	NA	NA	NA	NA	NA		
Chromium (Trivalent)	mg/kg	16,000	NS	<b>11</b>	<b>12</b>	<b>13</b>	NA	NA	NA	NA	NA	NA	NA	NA		
Lead	mg/kg	50	500	<b>95</b>	<b>24</b>	<b>15</b>	<b>41</b>	<b>4.9</b>	<b>45</b>	<b>5.6</b>	<b>19</b>	<b>14</b>	<b>33</b>	<b>6.1</b>		
Mercury	mg/kg	NS	NS	<b>0.069</b>	<b>0.19</b>	<b>0.019</b>	NA	NA	NA	NA	NA	NA	NA	NA		
Selenium	mg/kg	NS	NS	<0.48	<0.48	<0.48	NA	NA	NA	NA	NA	NA	NA	NA		
Silver	mg/kg	NS	NS	<0.12	<b>0.25 "J"</b>	<0.12	NA	NA	NA	NA	NA	NA	NA	NA		
<b>Polynuclear Aromatic Hydrocarbons (PAHs)</b>		Suggested Generic RCLs for PAH Compounds in Soil														
		Groundwater Pathway	Non-Industrial	Industrial												
Acenaphthene	µg/kg	38,000	600,000	60,000,000	<b>30.5</b>	<7.2	<b>410</b>	<b>38 "J"</b>	<13	<b>15.1 "J"</b>	<13	<b>89</b>	<13	<b>228</b>	<13	
Acenaphthylene	µg/kg	700	18,000	360,000	<b>37</b>	<7.2	<b>27</b>	<b>16.3 "J"</b>	<14	<b>29.7 "J"</b>	<14	<14	<14	<b>73</b>	<14	
Anthracene	µg/kg	3,000,000	5,000,000	300,000	<b>232</b>	<14	<b>1240</b>	<b>130</b>	<8.8	<b>114</b>	<8.8	<b>28.4</b>	<8.8	<b>640</b>	<8.8	
Benzo(a)anthracene	µg/kg	17,900	88	3,900	<b>650</b>	<15	<b>1180</b>	<b>244</b>	<10	<b>350</b>	<10	<b>96</b>	<10	<b>1620</b>	<10	
Benzo(b)fluoranthene	µg/kg	48,000	8.8	360	<b>510</b>	<15	<b>1100</b>	<b>254</b>	<7.7	<b>350</b>	<7.7	<b>121</b>	<7.7	<b>1230</b>	<7.7	
Benzo(k)fluoranthene	µg/kg	360,000	88	3,900	<b>640</b>	<b>10 "J"</b>	<b>1330</b>	<b>340</b>	<11	<b>460</b>	<11	<b>147</b>	<11	<b>1650</b>	<11	
Benzo(ghi)perylene	µg/kg	6,800,000	1,800	39,000	<b>313</b>	<14	<b>710</b>	<b>168</b>	<12	<b>253</b>	<12	<b>82</b>	<12	<b>540</b>	<12	
Benzo(k)fluoranthene	µg/kg	870,000	880	39,000	<b>257</b>	<11	<b>430</b>	<b>127</b>	<11	<b>137</b>	<11	<b>56</b>	<11	<b>530</b>	<11	
Chrysene	µg/kg	37,000	6,800	390,000	<b>570</b>	<13	<b>990</b>	<b>277</b>	<8.8	<b>350</b>	<8.8	<b>100</b>	<8.8	<b>1380</b>	<8.8	
Dibenz(a,h)anthracene	µg/kg	38,000	8.8	390	<b>97</b>	<11	<b>135</b>	<b>46</b>	<9.7	<b>83</b>	<9.7	<b>21.4 "J"</b>	<9.7	<b>191</b>	<9.7	
Fluoranthene	µg/kg	500,000	600,000	40,000,000	<b>1150</b>	<b>13.1 "J"</b>	<b>3500</b>	<b>550</b>	<11	<b>630</b>	<11	<b>170</b>	<11	<b>3600</b>	<11	
Fluorene	µg/kg	100,000	600,000	40,000,000	<b>55</b>	<6.5	<b>610</b>	<b>16.3 "J"</b>	<12	<b>21.6 "J"</b>	<12	<b>53</b>	<12	<b>174</b>	<12	
Indeno(1,2,3-cd)pyrene	µg/kg	680,000	88	3,900	<b>271</b>	<10	<b>600</b>	<b>137</b>	<9.9	<b>202</b>	<9.9	<b>65</b>	<9.9	<b>510</b>	<9.9	
1-Methylnaphthalene	µg/kg	23,000	1,100,000	70,000,000	<b>20.3 "J"</b>	<13	<b>139</b>	<12	<12	<b>75</b>	<b>14.1 "J"</b>	<b>26.5 "J"</b>	<12	<b>61</b>	<12	
2-Methylnaphthalene	µg/kg	20,000	600,000	40,000,000	<b>26.8 "J"</b>	<17	<b>193</b>	<9.4	<9.4	<b>101</b>	<9.4	<b>9.9 "J"</b>	<9.4	<b>79</b>	<9.4	
Naphthalene	µg/kg	400	20,000	110,000	<b>16.9 "J"</b>	<12	<b>243</b>	<12	<12	<b>73</b>	<12	<12	<12	<b>161</b>	<12	
Phenanthrene	µg/kg	1,600	18,000	390,000	<b>500</b>	<15	<b>2500</b>	<b>199</b>	<9.4	<b>350</b>	<9.4	<b>67</b>	<9.4	<b>1670</b>	<9.4	
Pyrene	µg/kg	8,700,000	500,000	30,000,000	<b>990</b>	<13	<b>2690</b>	<b>450</b>	<9.9	<b>520</b>	<9.9	<b>162</b>	<9.9	<b>3110</b>	<9.9	

Notes:

Laboratory analyses performed by: Synergy Environmental Labs (Appleton, WI)

mg/kg = milligrams per kilogram (equivalent to parts per million)

µg/kg = micrograms per kilogram (equivalent to parts per billion)

NA = Not Analyzed      NS = No Standard

LC = Analyte detected between laboratory Limit of Detection (LOD) and Limit of Quantitation (LOQ)

NR 720 RCL = Wisconsin Administrative Code, Chapter NR 720 generic Residual Contaminant Level (Industrial land use RCLs for RCRA metals).

Suggested Generic = more stringent generic residual contaminant level for protection of groundwater (gw) or direct contact (dc) pathway for non-Interim RCL Industrial land use from wdr publication n-519-87 "Soil Cleanup Levels for Polycyclic Aromatic Hydrocarbons (PAHs) Interim Guidance" (April 1997)

Exceedances: **BOLD** = detected compound

**BOX** = detected concentration greater than applicable regulatory standard.

**ITALIC UNDERLINE** = concentration greater than suggested generic RCL for PAH compounds in soil with regard to the protection of groundwater (groundwater pathway).