



December 20, 2023

Carol Investment Corporation
c/o Steven Dukatt
1410 S. Clinton St.
Chicago, IL 60607
Via Electronic Mail to awgreen1410@sbcglobal.com

KEEP THIS LEGAL DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Case Closure with Continuing Obligations
Sunrise Shopping Center – HF & FMR Operation, 2410-2424 10th Ave. & 1009 Marquette Ave.
South Milwaukee, WI 53172
BRRTS #: 02-41-579429, FID #: 241828620

Dear Mr. Dukatt:

The Wisconsin Department of Natural Resources (DNR) is pleased to inform you that the Sunrise Shopping Center – HF & FMR Operation 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.

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), and the case closure criteria of Wis. Admin. Code §§ NR 726.05, 726.09 and 726.11, and Wis. Admin. Code ch. NR 140.

The Sunrise Shopping Center – HF & FMR Operation site was investigated for a discharge of hazardous substances and/or environmental pollution from historical fill material and former industrial operations across the property. The property has since been redeveloped into the Sunrise Shopping Center, an outdoor strip mall. Case closure is granted for the polycyclic aromatic hydrocarbons and the identified benzene exceedances as documented in the case file. The site investigation and/or remedial action addressed soil, groundwater, and vapor. The remedial action consisted of injections in the area of naphthalene exceedances. Contamination remains in soil and groundwater, possibly found across the property due to the nature/origin of the contamination.

The case closure decision and COs required were based on the current use of the site for commercial purposes. The site is currently zoned industrial. Based on the land use and zoning, the site meets the non-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)
2410-2424 10th Ave. & 1009 Marquette Ave. (Source Property)	Cover (for soil) Residual Soil Contamination Residual Groundwater Contamination VI - Future Concern	November 7, 2023

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 plan dated November 7, 2023, 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 across the property as indicated on the enclosed maps (Figure B.2.b.1, Soil Contamination (PAHs), December 4, 2023, and Figure B.2.b.1.a, Southern Site Detail Showing Extent of Benzene Soil Contamination, December 4, 2023). If soil in the location(s) shown on the maps 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 cover as shown on the enclosed map (Figure D.2.a, Barrier Location Map, December 1, 2023) shall be maintained in compliance with the enclosed maintenance plan, dated November 7, 2023. The purpose of the cover is to minimize the infiltration of water through 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).

Other Soil-Related Closure Information

Sites with Historic Waste Fill (Wis. Admin. Code § NR 506.085)

Information presented in the site investigation report indicates that subsurface materials consist of historical waste fill material, located potentially across the property. As such, the property owner must comply with solid waste rules in Wis. Admin. Code ch. NR 500 to 599 while any waste materials remain in place. Any future redevelopment of the property must account for the presence of waste materials and will require the issuance of an approval from the DNR to build on waste materials prior to the start of any construction.

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 polycyclic aromatic hydrocarbons is present potentially across the site, as shown on the enclosed maps (Figure B.3.b.1a, Groundwater Isoconcentration (Benzo(A)Pyrene), November 2, 2023, Figure B.3.b.1b, Groundwater Isoconcentration (Benzo(B)Fluoranthene), November 2, 2023, and Figure B.3.b.1c, Groundwater Isoconcentration (Chrysene), November 2, 2023). 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.

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.

VI - Future Concern: (Wis. Stat. § 292.12(2), Wis. Admin. Code § NR 726.15(2)(L) or (m), as applicable. Benzene remains in soil at the southern portion of the property, as shown on the enclosed map (Figure B.2.b.1.a, Southern Site Detail Showing Extent of Benzene Soil Contamination, December 4, 2023), 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. At this time of closure, a strip mall is present on the property but no structures are completed over the identified benzene contamination in soil.

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 November 7, 2023, for the cover to conduct inspections annually and to use the inspection log (DNR Form 4400-305) to document the required inspections. The maintenance plan and inspection log are to be kept up-to-date and in a place accessible to the property owner. The property owner shall submit the 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 cover 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,
- Changing the use or occupancy of the property to a residential exposure setting, which may include certain uses such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

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 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 inspection logs 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 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 letter, please contact DNR project manager Riley Neumann at (414) 750-7030 or riley.neumann@wisconsin.gov.

Sincerely,



Timothy G. Alessi, P.G.
Southeast Region Team Supervisor
Remediation & Redevelopment Program

Attachments:

- Figure B.2.b.1, Soil Contamination (PAHs), December 4, 2023
- Figure B.2.b.1.a, Southern Site Detail Showing Extent of Benzene Soil Contamination, December 4, 2023
- Figure D.2.a, Barrier Location Map, December 1, 2023
- Attachment D, Maintenance Plan, November 7, 2023
- Inspection Log (DNR Form 4400-305)
- Figure B.3.b.1a, Groundwater Isoconcentration (Benzo(A)Pyrene), November 2, 2023
- Figure B.3.b.1b, Groundwater Isoconcentration (Benzo(B)Fluoranthene), November 2, 2023
- Figure B.3.b.1c, Groundwater Isoconcentration (Chrysene), November 2, 2023

cc.

Tom DePaul, DAI Environmental - depaul@daienv.com

Chris Cailles, DAI Environmental - cailles@daienv.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)

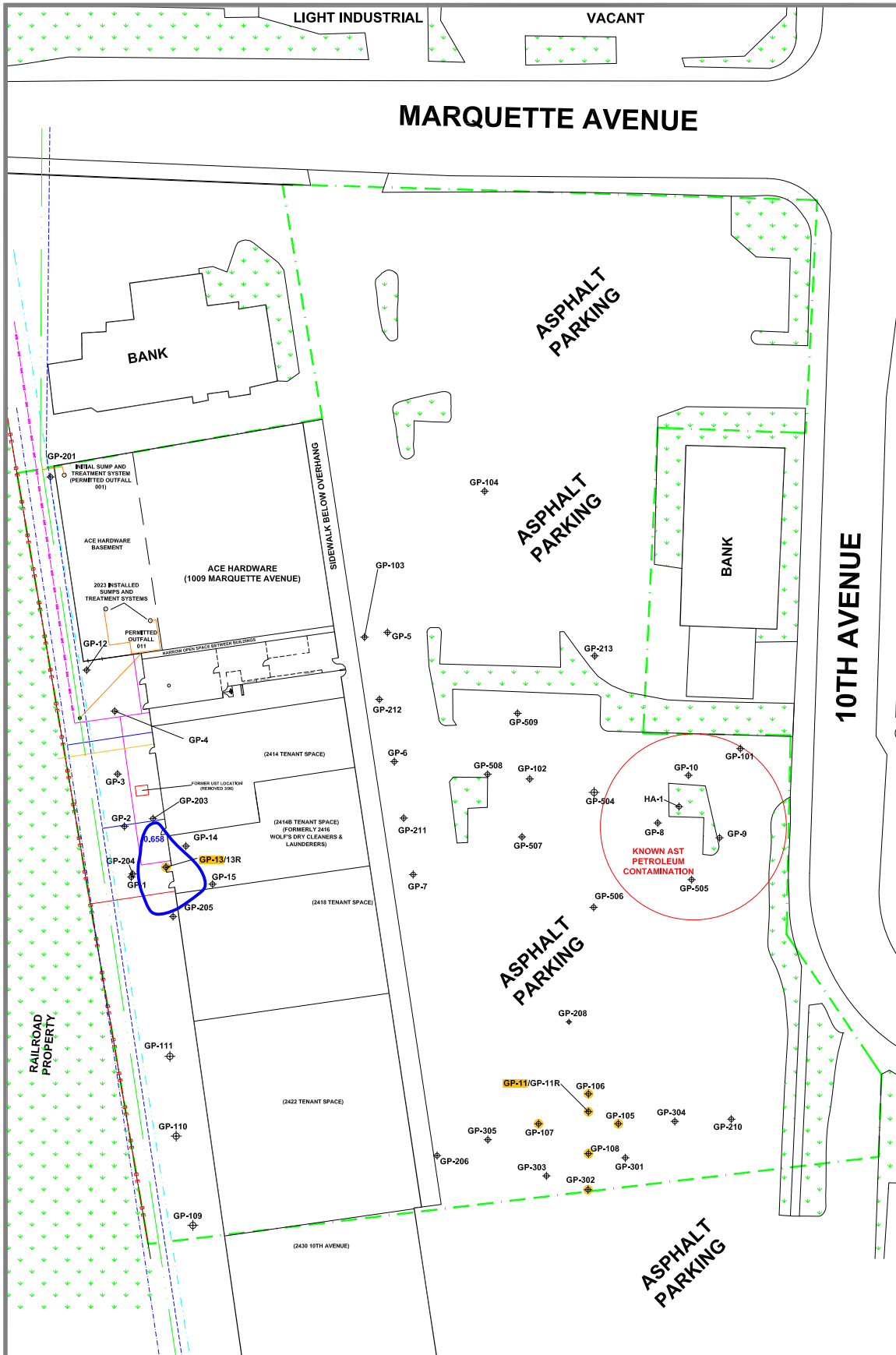
Environmental Contamination and Your Real Estate (RR-973)

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

Development at Historic Fill Site or Licensed Landfills: What You Need to Know (RR-683)

Development at Historic Fill Site or Licensed Landfills: Guidance for Investigation (RR-684)

Development at Historic Fill Site or Licensed Landfills: Considerations and Potential Problems (RR-685)



LEGEND

--- APPROXIMATE PROPERTY BOUNDARY

NOTE: THE PROPERTY BOUNDARY IS ALSO CONSIDERED TO BE THE EXTENT OF PAH CONTAMINATION FOR ALL RCL ROUTES OF EXPOSURE AS A RESULT OF THE SITE-WIDE PRESENCE OF FILL AND HISTORICAL OPERATIONS; LOCALIZED POCKETS OF CONTAMINATION HAVE BEEN DEFINED, BUT CONTAMINATION MAY BE PRESENT ACROSS THE ENTIRETY OF THE SITE

VEGETATION

(2410) UNIT ADDRESS

FIBER OPTICS UTILITY LINE

GAS UTILITY LINE

SANITARY UTILITY LINE

STORM SEWER UTILITY LINE

WATER UTILITY LINE (12")

WATER UTILITY LINE (4")

OVERHEAD ELECTRIC UTILITY LINE

DISCHARGE PIPING (PIPING FROM SUMP TO DISCHARGE POINT INCLUDES VERTICALS; ONLY HORIZONTAL LAYOUT DEPICTED)

MANHOLE LOCATION

SOIL BORING LOCATION

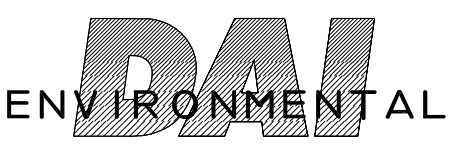
PAH EXCEEDANCE OF THE NON-INDUSTRIAL DC AND/OR GROUNDWATER RCL

NAPHTHALENE ISOCONCENTRATION LINE (0.658-mg/Kg)

NOTE: DC RCL NOT APPLICABLE BELOW 4- FEET (NO ISOCONCENTRATION LINES REQUIRED)

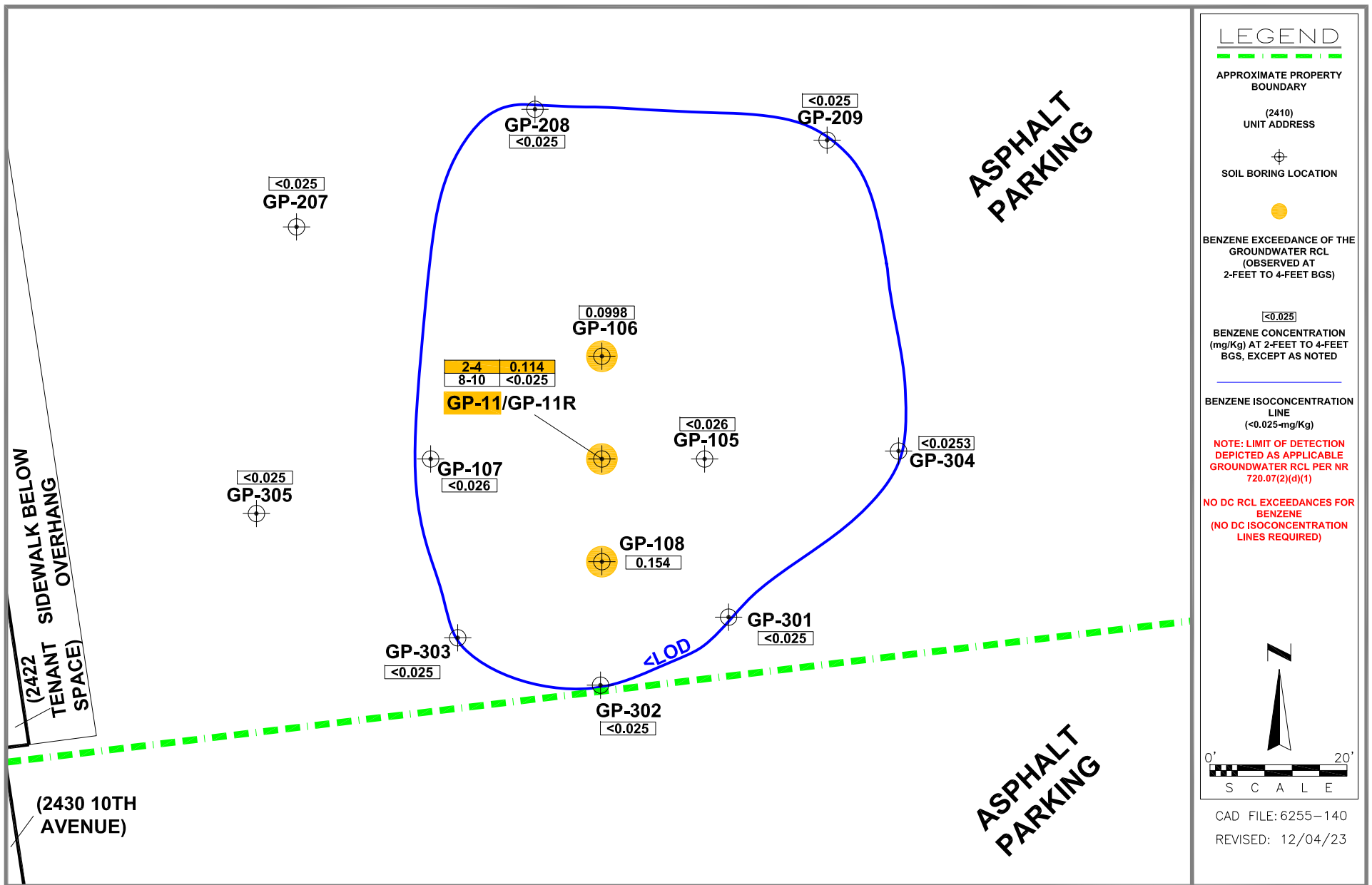
SCALE: 0' to 75'

CAD FILE: 6255-239A2
REVISED: 12/04/23



SUNRISE SHOPPING CTR-HF & FMR
2410-2424 10TH AVENUE
1009 MARQUETTE AVENUE
SOUTH MILWAUKEE, WISCONSIN

FIGURE B.2.b.1
SOIL CONTAMINATION
(PAHs)



DAI
ENVIRONMENTAL

SUNRISE SHOPPING CENTER-HF & FMR
2410-2424 10TH AVENUE
1009 MARQUETTE AVENUE
SOUTH MILWAUKEE, WISCONSIN

FIGURE B.2.b.1.a
SOUTHERN SITE DETAIL SHOWING
EXTENT OF BENZENE SOIL CONTAMINATION
(2-FEET TO 4-FEET BGS)



LEGEND

APPROXIMATE PROPERTY BOUNDARY

NOTE: THE PROPERTY BOUNDARY IS ALSO CONSIDERED TO BE THE EXTENT OF PAH CONTAMINATION FOR ALL RCL ROUTES OF EXPOSURE AS A RESULT OF THE SITE-WIDE PRESENCE OF FILL AND HISTORICAL OPERATIONS; LOCALIZED POCKETS OF CONTAMINATION HAVE BEEN DEFINED, BUT CONTAMINATION MAY BE PRESENT ACROSS THE ENTIRETY OF THE SITE

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(2410) UNIT ADDRESS

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DISCHARGE PIPING (PIPING FROM SUMP TO DISCHARGE POINT INCLUDES VERTICALS; ONLY HORIZONTAL LAYOUT DEPICTED)

MANHOLE LOCATION

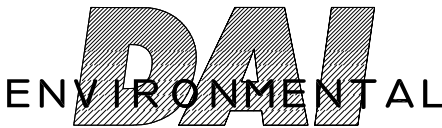
SOIL BORING LOCATION

PAH EXCEEDANCE OF THE NON-INDUSTRIAL DC AND/OR GROUNDWATER RCL

REQUIRED ENGINEERED BARRIER TO ADDRESS SITE-WIDE PAH SOIL CONTAMINATION (CONCRETE OR ASPHALT PAVEMENT, CLEAN SOIL LANDSCAPE ISLANDS)

SCALE: 0' to 75'

CAD FILE: 6255-245
REVISED: 12/01/23



**SUNRISE SHOPPING CTR-HF & FMR
2410-2424 10TH AVENUE
1009 MARQUETTE AVENUE
SOUTH MILWAUKEE, WISCONSIN**

**FIGURE D.2.a
BARRIER LOCATION MAP
(PAHs AND BENZENE)**

BARRIER MAINTENANCE PLAN

November 7, 2023

Sunrise Shopping Center – HF & FMR Operation
2410-2424 10th Avenue and 1009 Marquette Avenue
South Milwaukee, Wisconsin 53172
BRRTS Activity # 02-41-579429
FID # 241828620

Parcel Index Number: 7769994001

Legal Description:

PARCEL A:

All that part of the Southeast ¼ and the Southwest ¼ of Section 11, Town[ship] 5 North, Range 22 East, in the City of South Milwaukee, County of Milwaukee, State of Wisconsin, bounded and described as follows:

Commencing at the Northeast corner of said Southwest ¼ Section; thence South 89° 28' 25" West along the North line of said Southwest ¼ Section 72.07 feet; thence South 11° 34' 55" East, 157.30 feet; thence South 78° 25' 05" West, 147.87 feet; to a point on the East line of the Chicago & North Western Transportation Company (d/b/a Chicago and Northwestern Railroad) right-of-way; thence South 11° 23' 45" East, along said East line, 348.33 feet; thence North 79° 28' 25" East, 356.66 feet; thence due North 7.45 feet to a point on the West line of 10th Avenue; thence North 31° 33' 00" West, along said West line 66.89 feet; thence due North along said West line 110.40 feet; thence due West 60.00 feet; thence due North 150.00 feet; thence due East 80.00 feet to a point on the West line of 10th Avenue; thence due North along said West line 139.80 feet to a point on the North line of said Southeast ¼ Section; thence [south] 88° 56' 00" West along said North line, 199.16 feet to the place of beginning.

EXCEPTING THEREFROM the Northerly 33 feet.

PARCEL B:

A non-exclusive traffic easement as reserved in deed recorded January 4, 1972, on Reel 629, Image 1085 as Document No. 4646001, over the North and West 15 feet of the land conveyed in said deed.

PARCEL C:

A non-exclusive Easement and Party Wall Agreement entered into by and between Frank P. Crivello and Joseph A. Crivello and Maureen A Caveny Lang, Mary Kathleen Doyle, Maureen Fenno, Mary Jane Caveney, Kathleen Ann Caveney, Richard Caveney, Thomas J. Caveney and Janice Theune dated April 24, 1989 and recorded May 4, 1989 on Reel 2325, Image 1500 as Document No. 6273354, as amended by First Amendment to Easement and Party Wall Agreement recorded June 2, 1999, on Reel 4575, Image 548, as Document No. 7751173.

This document is the Maintenance Plan for the asphalt and concrete pavement and clean soil landscape island barriers 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 surface covering being utilized as a barrier occupying the area over the contaminated soil and groundwater on-site.

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

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

Description of Contamination

Subsurface investigations identified soil and groundwater contaminated with Polynuclear Aromatic Hydrocarbons (PAHs). Benzene, a Petroleum Volatile Organic Compound (PVOC), contamination was also identified in the soil. Following the completion of remedial actions, the following residual contamination remains in place:

PAHs: Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene, Chrysene, Dibenzo(a,h)anthracene, Indeno(1,2,3-cd)pyrene, Naphthalene

PVOC: Benzene

Most PAH soil concentrations are above the Residual Contaminant Levels (RCLs) for non-industrial (and industrial) direct contact (DC RCL). Certain PAHs (Benzo(a)pyrene, Benzo(b)fluoranthene, Chrysene) and Benzene soil concentrations exceed the RCL for protection of groundwater (GW RCL). Most contamination is observed within the uppermost 4-ft below ground surface (bgs). Figure D.2.a shows the locations of identified residual soil contamination and notes that unidentified soil contamination may be present in the site-wide fill. Figures B.3.b.1a-1c depict the most recent groundwater contamination for the PAHs Benzo(a)pyrene, Benzo(b)fluoranthene, and Chrysene. See Exhibit A for figures.

Description of Barrier to be Maintained

Engineered barriers are implemented to address identified residual Benzene and PAH soil contamination (approximately 30,446-ft²) located below the south-center and east-center portions of the Sunrise Shopping Center property (parking lot area) and unidentified PAH soil contamination that may be present in the site-wide fill material observed across the entirety of the Sunrise Shopping Center property. The existing barrier areas consist of concrete building pad, asphalt pavement (outside building), or 2-ft thick clean soil landscape islands with the parking area. The asphalt pavement and concrete building slab are approximately 3-inch thick. The asphalt pavement and the concrete slab cover nearly the entire property; thus the clean soil barriers are limited. The barriers are already in-place; thus, no engineering design specifications are included in this *Barrier Maintenance Plan*.

Figure D.2.a (see Exhibit A) depicts the type and extent of the existing barriers being implemented as permanent engineering controls across the entire site. Photographic documentation of the barriers is provided in Exhibit B.

Barrier Purpose

The barrier over the contaminated soil and groundwater serve as a barrier to present direct human contact with residual soil contamination that might otherwise pose a threat to human health. The barrier also acts as a partial infiltration barrier to minimize future soil-to-groundwater contamination migration that would violate the groundwater standards in ch. NR 140, Wisconsin Administrative Code. Based on the current use of the property, commercial, the barrier should function as intended unless disturbed.

All DC RCL exceedances for PAHs are located below the asphalt pavement barrier. All other residual soil contamination was observed above the GW RCL and is located below the existing asphalt pavement. Any unidentified PAH contamination in the site-wide fill is below pavement or the 2-ft clean soil landscape islands.

Annual Inspection

The asphalt pavement and concrete slab overlying the contamination depicted in Figure D.2.a will be inspected once a year, at a minimum, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause additional infiltration into or exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed and where infiltration from the surface will not be effectively minimized will be documented.

A log of the inspections and any repairs will be maintained by the property owner and recorded on Wisconsin Department of Natural Resources (WDNR) Form 4400-305, *Continuing Obligations Inspection and Maintenance Log* (see Exhibit C). The log will include recommendations for necessary repair of an 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 *Barrier Maintenance Plan* and completed inspection logs will be kept at the address of the property owner and available for submittal or inspection by WDNR representatives upon their request. A copy of the inspection form and log will be submitted to the WDNR following the completion of annual (at a minimum) inspection, if required by 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 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 paving or concrete slab overlying the contamination 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 the Maintenance Plan unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the asphalt paving and concrete barrier, will maintain a copy of this *Barrier 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 Barrier

The following activities are prohibited on any portion of the property when the asphalt paving or concrete building pad is required as shown on the attached Figures D.2.a-D.2.c, 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 (other than the already existing structure); or
7. changing the use or occupancy of the property to a residential exposure setting, which may include certain uses, such as single or multiple family residences, a school, day care, senior center, hospital, or similar residential exposure settings.

If removal, replacement or other changes to a cover, or a building, which is acting as a cover, are considered, the property owner will contact the DNR at least 45 days before taking such 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 Barrier Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.


Contact Information

November 2023

Property Owner/

Responsible Party: Carol Investment Corporation
1410 South Clinton Street
Chicago, Illinois 60607
(773) 227-6500

Signature:

DocuSigned by:

9742BF2506894F0...
Steven Dukatt, President

Consultant:

DAI Environmental, Inc.
27834 North Irma Lee Circle
Lake Forest, Illinois 60045
(847) 573-8900

WDNR:

Mr. Riley Neumann
Remediation & Redevelopment Program
Wisconsin Department of Natural Resources
2300 North Martin Luther King Drive
Milwaukee, WI 53212

SITE-WIDE ENGINEERED BARRIERS



IMAGES OF ASPHALT PAVEMENT WITHIN EASTERN PARKING LOT IMPLEMENTED AS ENGINEERED BARRIER; CLEAN SOIL LANDSCAPE ISLANDS (LIMITED) WITHIN PARKING LOT ALSO IMPLEMENTED AS ENGINEERED BARRIER



VIEW OF ASPHALT PAVEMENT WITHIN WESTERN (REAR) DRIVEWAY BEHIND 2414 & 2414B TENANT SPACES IMPLEMENTED AS ENGINEERED BARRIER



VIEWS OF CONCRETE PAVEMENT FLOOR SLAB OF 2410 TENANT SPACE AFTER CHEMICAL TREATMENT AND SUB-SLAB DEPRESSURIZATION SYSTEM INSTALLATION/PRIOR TO OCCUPANCY BY TENANT; CONCRETE PAVEMENT IMPLEMENTED AS ENGINEERED BARRIER



VIEWS OF 2410 TENANT SPACE AFTER OCCUPANCY BY TENANT; CONCRETE PAVEMENT IMPLEMENTED USED AS ENGINEERED BARRIER



VIEW OF CONCRETE PAVEMENT FLOOR SLAB OF 2412 TENANT SPACE AFTER CHEMICAL TREATMENT AND SUB-SLAB DEPRESSURIZATION SYSTEM INSTALLATION/PRIOR TO OCCUPANCY BY TENANT; CONCRETE PAVEMENT IMPLEMENTED AS ENGINEERED BARRIER



VIEW OF ASPHALT PAVEMENT WITHIN WESTERN (REAR) DRIVEWAY BEHIND 2410 & 2412 TENANT SPACES IMPLEMENTED AS ENGINEERED BARRIER

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

Activity (Site) Name Sunrise Shopping Center	BRRTS No.
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Inspections are required to be conducted (see closure approval letter):

annually
 semi-annually
 other – specify _____

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

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

BRRTS No.

Sunrise Shopping Center

Activity (Site) Name

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

Page 2 of 2

{Click to Add/Edit Image}

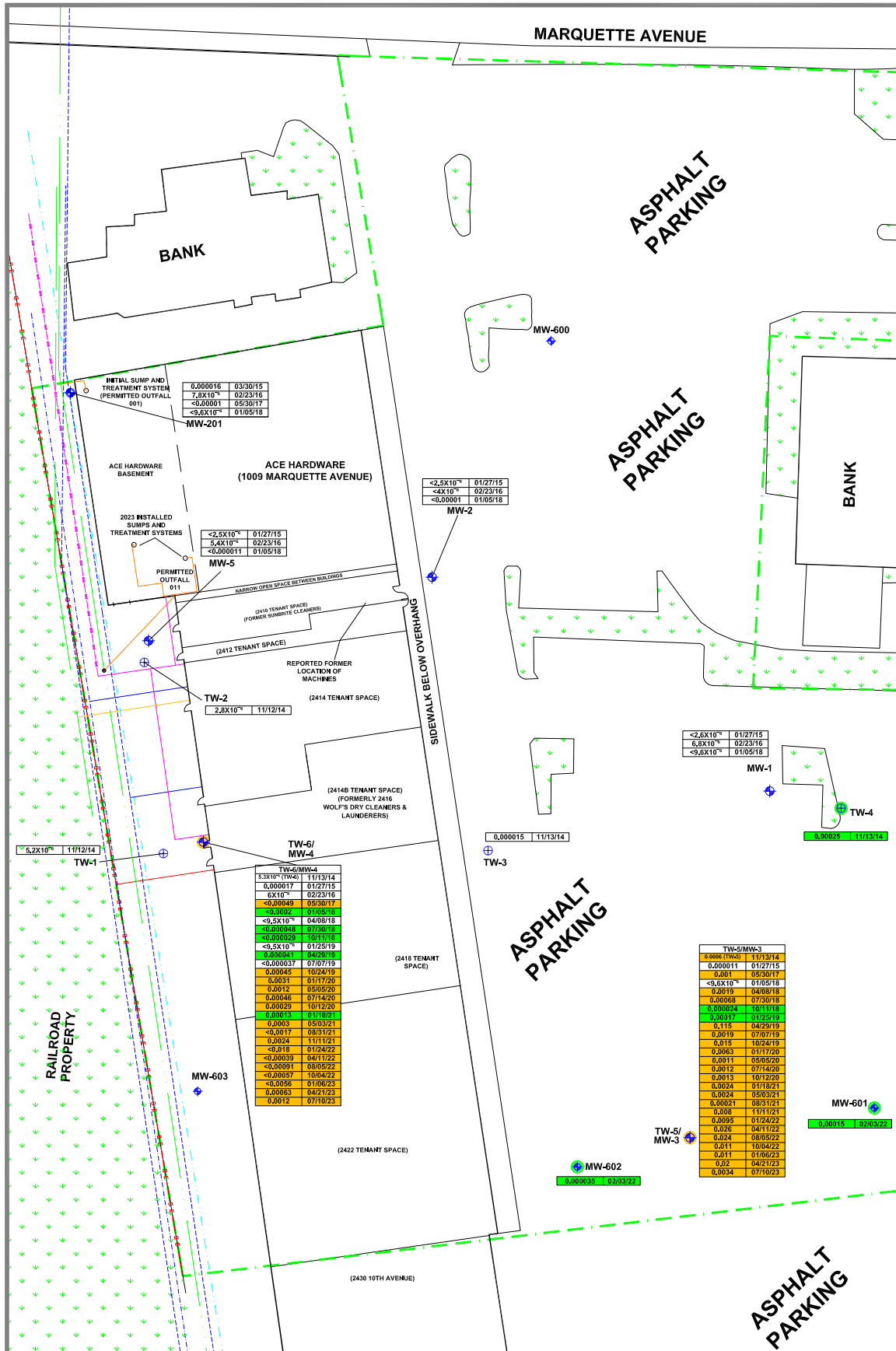
Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title:



LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- VEGETATION
- (2410) UNIT ADDRESS
- FIBER OPTICS UTILITY LINE
- GAS UTILITY LINE
- SANITARY UTILITY LINE
- STORM SEWER UTILITY LINE
- WATER UTILITY LINE (12")
- WATER UTILITY LINE (4")
- OVERHEAD ELECTRIC UTILITY LINE
- DISCHARGE PIPING (PIPING FROM SUMP TO DISCHARGE POINT INCLUDES VERTICALS; ONLY HORIZONTAL LAYOUT DEPICTED)
- MONITORING WELL LOCATION
- SOIL BORING WITH TEMPORARY WELL LOCATION
- OBSERVED EXCEEDANCE OF PAL
- OBSERVED EXCEEDANCE OF PAL AND ES

PAH CONC. mg/L	SAMPLE DATE
0.000016	03/30/15
7.8X10 ⁻⁵	02/23/16
<0.00001	05/30/17
<9.6X10 ⁻⁵	01/05/18

MW-201

ACE HARDWARE BASEMENT

2023 INSTALLED SUMPS AND TREATMENT SYSTEMS

PAH CONC. mg/L	SAMPLE DATE
<2.5X10 ⁻⁶	01/27/15
5.4X10 ⁻⁶	02/23/16
<0.000011	01/05/18

MW-5

PERMITTED OUTFALL 011

REPORTED FORMER LOCATION OF MACHINES

TW-2

2.8X10⁻⁶ | 11/12/14

(2414 TENANT SPACE)

(2418 TENANT SPACE) (FORMERLY 2416 WOLF'S DRY CLEANERS & LAUNDRETS)

TW-6/ MW-4

PAH CONC. mg/L	SAMPLE DATE
5.3X10 ⁻⁶ (TW-6)	11/13/14
0.000017	01/27/15
6X10 ⁻⁶	02/23/16
<0.20040	05/30/17
<0.0002	01/05/18
<0.5X10 ⁻⁶	04/08/18
<0.00044	07/30/18
<0.00023	10/11/18
<0.5X10 ⁻⁶	01/25/19
0.00004	04/29/19
<0.00037	07/07/19
0.00045	10/24/19
0.001	01/17/20
0.0012	05/05/20
0.00046	07/14/20
0.00029	10/12/20
0.0013	01/18/21
0.0003	05/03/21
<0.017	08/31/21
0.0024	11/11/21
<0.018	01/24/22
<0.00039	04/11/22
<0.00091	08/05/22
<0.00057	10/04/22
<0.0056	01/06/23
0.00063	04/21/23
0.0012	07/10/23

MW-603

(2422 TENANT SPACE)

(2430 10TH AVENUE)

PAH CONC. mg/L	SAMPLE DATE
<2.6X10 ⁻⁶	01/27/15
6.8X10 ⁻⁶	02/23/16
<9.6X10 ⁻⁶	01/05/18

MW-1

0.000025 | 11/13/14

TW-4

0.000015 | 11/13/14

TW-3

0.000015 | 11/13/14

TW-5/ MW-3

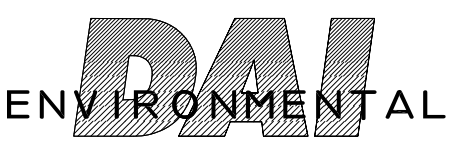
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0.000011	01/27/15
0.001	05/30/17
<9.6X10 ⁻⁶	01/05/18
0.0019	04/08/18
0.00068	07/30/18
0.000046	10/11/18
0.00017	01/25/19
0.115	04/29/19
0.0019	07/07/19
0.015	10/24/19
0.0063	01/17/20
0.0011	05/05/20
0.0012	07/14/20
0.0013	10/12/20
0.0024	01/18/21
0.0024	05/03/21
0.0021	08/31/21
0.008	11/11/21
0.0095	01/24/22
0.026	04/11/22
0.024	08/05/22
0.041	10/04/22
0.041	01/06/23
0.02	04/21/23
0.0034	07/10/23

MW-601

0.000015 | 02/03/22

MW-602

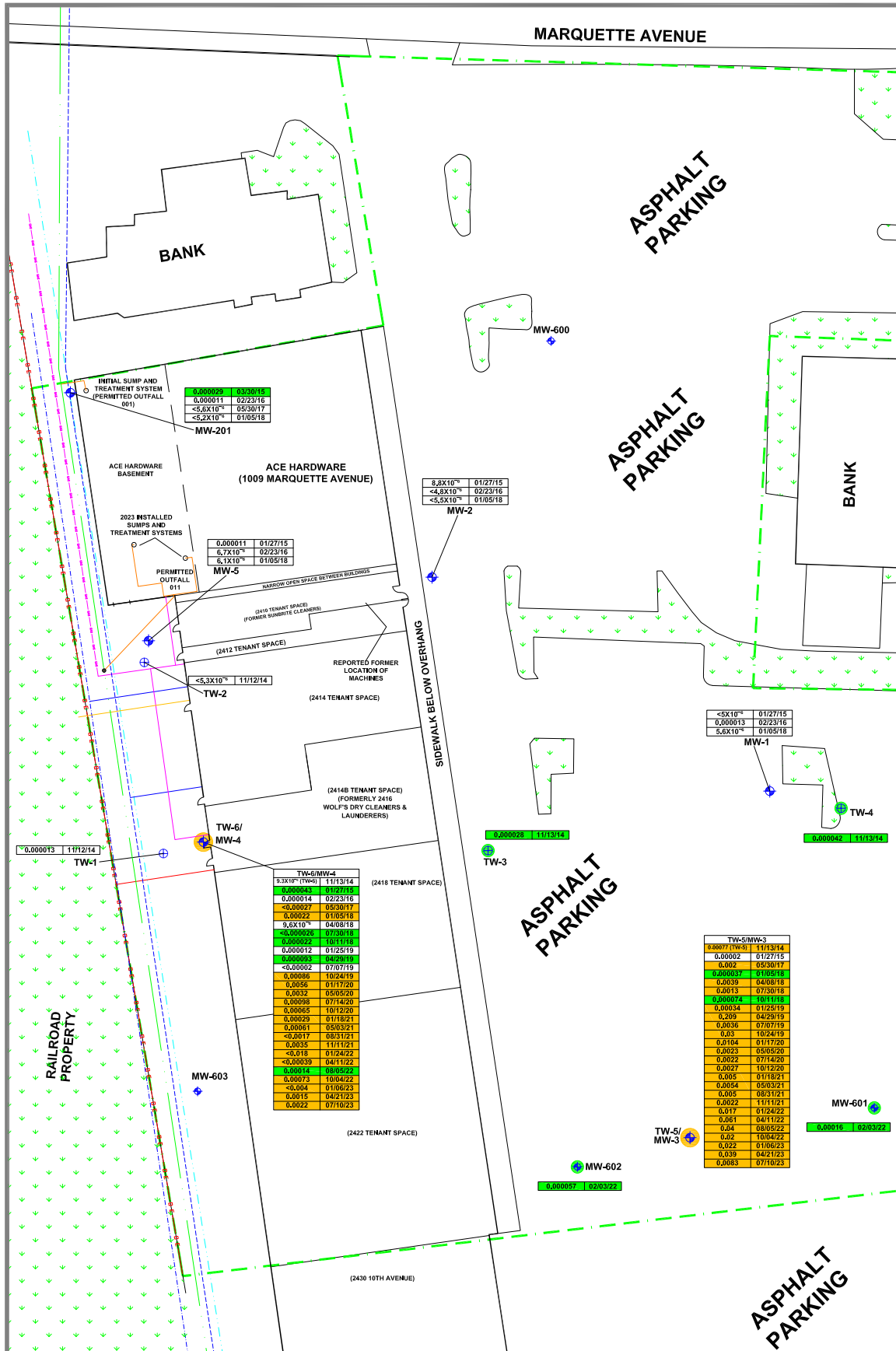
0.000035 | 02/03/22



SUNRISE SHOPPING CTR-HF & FMR
 2410-2424 10TH AVENUE
 1009 MARQUETTE AVENUE
 SOUTH MILWAUKEE, WISCONSIN

FIGURE B.3.b.1a
 GROUNDWATER
 ISOCONCENTRATION
 (BENZO(A)PYRENE)

CAD FILE: 6255-215F1
 REVISED: 11/02/23

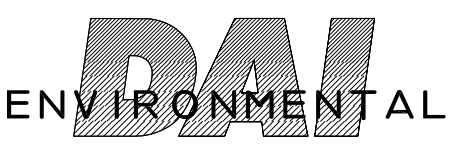


LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- VEGETATION (2410) UNIT ADDRESS
- FIBER OPTICS UTILITY LINE
- GAS UTILITY LINE
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- OBSERVED EXCEEDANCE OF PAL AND ES

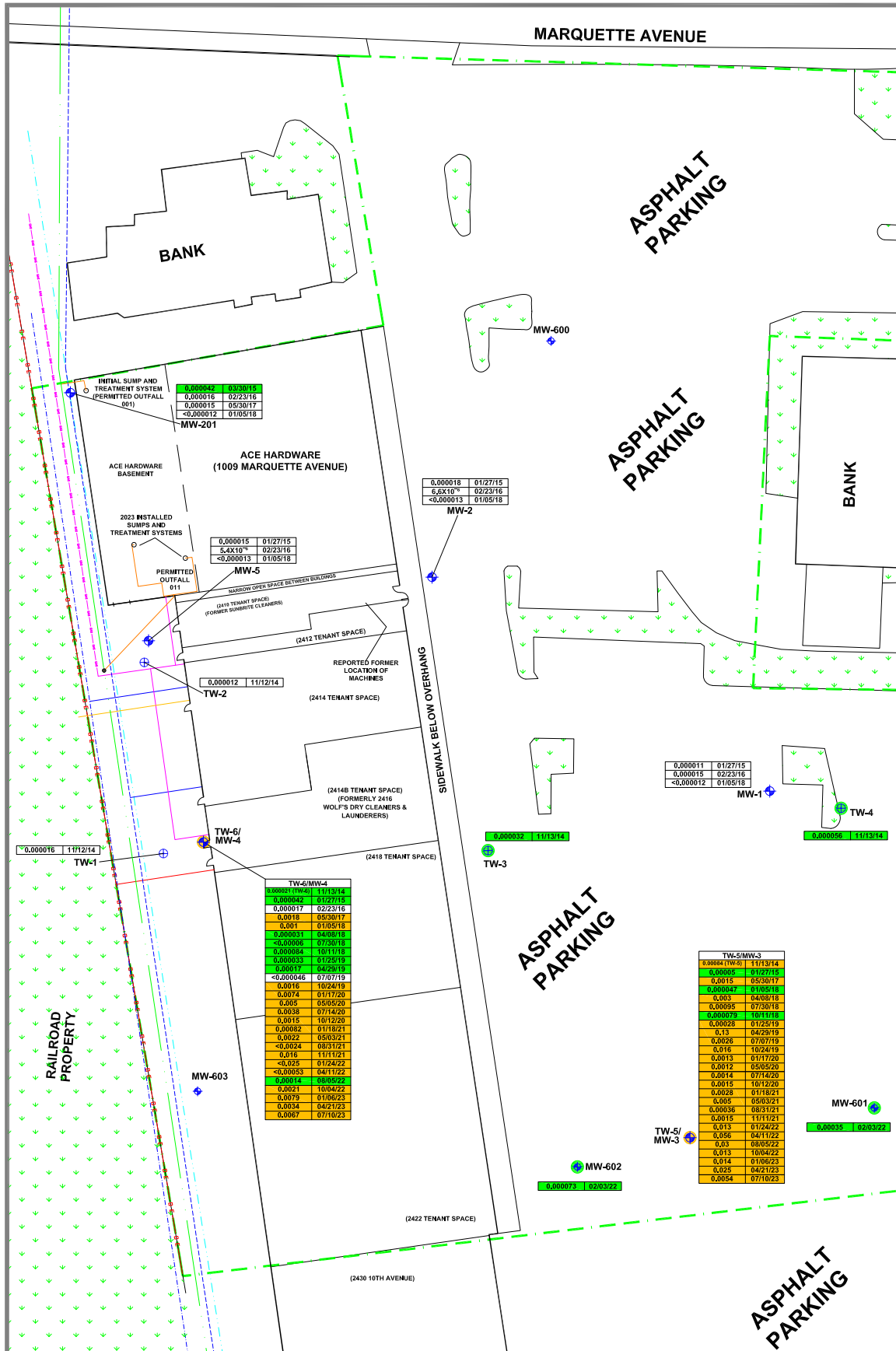
PAH CONC. mg/L	SAMPLE DATE
0.000013	11/12/14
0.000011	01/27/15
0.000011	02/23/16
6.7X10 ⁻⁶	02/23/16
5.1X10 ⁻⁶	01/05/18
0.000011	01/27/15
6.7X10 ⁻⁶	02/23/16
5.1X10 ⁻⁶	01/05/18
8.8X10 ⁻⁶	01/27/15
4.8X10 ⁻⁶	02/23/16
5.5X10 ⁻⁶	01/05/18
0.000013	11/12/14
0.000013	01/27/15
0.000013	02/23/16
5.6X10 ⁻⁶	01/05/18
0.000028	11/12/14
0.000042	11/13/14
0.000013	11/13/14
0.00002	05/30/17
0.000037	01/05/18
0.00139	04/05/18
0.0013	07/30/18
0.000074	10/11/18
0.000034	01/25/19
0.209	04/29/19
0.0036	07/07/19
0.83	10/24/19
0.0104	01/17/20
0.0023	05/05/20
0.0022	07/14/20
0.0027	10/12/20
0.005	01/18/21
0.0054	05/03/21
0.005	08/31/21
0.0022	11/11/21
0.017	01/24/22
0.061	04/11/22
0.04	08/05/22
0.02	10/04/22
0.022	01/06/23
0.036	04/21/23
0.0083	07/10/23

CAD FILE: 6255-216F1
REVISED: 11/02/23



SUNRISE SHOPPING CTR-HF & FMR
2410-2424 10TH AVENUE
1009 MARQUETTE AVENUE
SOUTH MILWAUKEE, WISCONSIN

FIGURE B.3.b.1b
GROUNDWATER
ISOCONCENTRATION
(BENZO(B)FLUORANTHENE)



LEGEND

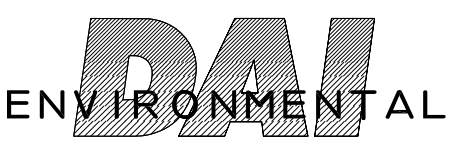
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- OBSERVED EXCEEDANCE OF PAL
- OBSERVED EXCEEDANCE OF PAL AND ES

PAH CONC. mg/L	SAMPLE DATE
----------------	-------------

0' 65'

S C A L E

CAD FILE: 6255-217F1
REVISED: 11/02/23



SUNRISE SHOPPING CTR-HF & FMR
2410-2424 10TH AVENUE
1009 MARQUETTE AVENUE
SOUTH MILWAUKEE, WISCONSIN

FIGURE B.3.b.1c
GROUNDWATER
ISOCONCENTRATION
(CHRYSENES)