

COVER MAINTENANCE PLAN

Date:	March 23, 2023
Site Name:	Cristo Rey Jesuit High School
Address:	1818 W National Avenue Milwaukee, WI 53202
Property ID:	4339927111
Legal Description:	LANDS IN SE 1/4 SEC 31-7-22 LANDS IN SD 1/4 SEC AND PARCELS 1 & 2 CSM NO 4352 COM AT A PT 35' S OF THE NW COR OF SD 1/4 SEC BEING THE S LI OF W PIERCE ST & THE E LI OF S 20TH ST-TH S 337.89'-TH N 88DEG 29' 19' E 188.0'-TH S 44DEG 02' 28' E 82.0'-TH S 21DEG 31' 55' E 80.0' TO A PT ON N LI OF W NATIONAL AV-TH ELY ALG SD LI 575.68' TO A PT-TH NLY 402.91' TO A PT IN S LI W PIERCE ST-TH WLY 848.55' TO THE PT OF COMM
WDNR ID:	BRRTS# 02-41-583465 FID# 241878450

INTRODUCTION

This Cover Maintenance Plan (CMP) for the above referenced site ("Site") was prepared in accordance with s. NR 724.13(2), Wisconsin Administrative Code. The format of this CMP generally follows Wisconsin Department of Natural Resources (WDNR) Publication RR-980, dated April 2014.

Additional Site-specific information can be found in:

- The case file in the WDNR Southeast Region office (the current WDNR project manager for the Site is Linda Michalets);
- BRRTS on the Web ([WDNR EM/RR BOTW \(wi.gov\)](http://WDNR.EM/RR.BOTW.wi.gov));and
- RR Sites Map ([Wisconsin DNR](http://Wisconsin.DNR)).

Current and all subsequent Property Owners shall maintain a copy of this CMP and make it available to their employees or contractors conducting cover inspections and maintenance activities.

D.1. DESCRIPTIONS

Site Description

The Site is a 7.59-acre parcel currently developed with a school building, drive & parking areas, limited landscaping, and artificial turf athletic field. The landscaped areas were constructed by importing 8" - 12" of clean imported soils overlayed by 3" - 4" of clean imported topsoils, and seeded with grass. A map depicting the layout of the Site is included in **Attachment D.2.**

Description of Residual Soil Contamination

Residual soil contamination consists primarily of shallow fill soils with polynuclear aromatic hydrocarbon (PAH) and Resource Conservation and Recovery Act (RCRA) metals concentrations greater than WDNR industrial direct contact residual contaminant levels (RCLs). There are also volatile organic compounds (VOCs) at concentrations exceeding WDNR groundwater pathway RCLs.

Residually impacted soils exceeding the WDNR industrial direct contact RCLs are located from approximately 0.5 to 4 feet (ft) below ground surface (bgs) and impacted soils exceeding the WDNR soil to groundwater pathway RCLs were encountered at depths to 13.5 ft bgs at the Subject Property. Due to the nature of fill-contaminated sites, the potential exists for contamination to exceed RCLs at any location across the Subject Property. Therefore, the cover materials over the entire site will be maintained to limit contact with contaminated soils, and limit infiltration of surface water through the contaminated soils.

Cover to be Maintained

The WDNR-approved cover consists of the following components:

- School building;
- Artificial turf athletic field;
- Paved drive/parking areas;
- Limited landscaped areas.

The extent of the cover to be maintained covers the entire Subject Property as depicted on **Attachment D.2**. Photographs of the cover are included in **Attachment D.3**.

Cover Purpose

The purpose of the cover is to prevent direct contact with impacted fill soils and limit infiltration of rainwater that could lead to the migration of contaminants.

Cover Inspection

The cover shall be inspected once per year, normally in the spring after the snow melt. The annual inspection shall assess the cover for damage or deterioration (e.g., settling or weathering cracks, stormwater erosion rills, or deterioration of turf materials).

A log of the cover inspections and any repairs shall be completed and maintained. A copy of the inspection log (WDNR Form 4400-305, Continuing Obligations Inspection and Maintenance Log) is included as **Attachment D.4**. The log shall include a description of the condition of the cover; recommendations for repair or maintenance; documentation of the implementation of recommended repairs or maintenance; and photographic documentation of inspection, repair, and

maintenance activities. Any area where soil beneath the cover has become exposed shall be documented. A copy of the completed logs shall be kept on-Site or at the address of the property owner and be available for submission to or review by WDNR upon request.

Cover Maintenance

Repairs to the cover shall be conducted if the inspection reveals excessive settling, cracking, erosion, or other deterioration. Repairs shall be conducted by the owner as soon as practical. Manufacture maintenance guidelines for the Artificial turf athletic field is included in **Attachment D.4.i**. The repair activities will generally include, but are not limited to, the following:

- Patching, crack-sealing or resurfacing;
- Regrading and compacting eroded areas;
- Repairing damaged or deteriorated turf.

If maintenance activities expose the underlying impacted soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal protection equipment (PPE). If underlying impacted soil is excavated, it will be replaced under the re-established cover or transported to an appropriately licensed facility for landfill disposal pursuant to a waste profile established by the property owner. If temporary stockpiling of impacted soil is necessary during maintenance, the stockpiled impacted soil shall be placed on heavy-duty plastic sheeting and covered with a secured tarp or plastic sheeting.

In the event the cover is removed or replaced, the replacement barrier will be functionally equal to the cover. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this CMP unless indicated otherwise by the WDNR or its successor.

Prohibition of Activities and Notification of WDNR Prior to Actions Affecting a Cover

The following activities are prohibited within the cover barrier, unless prior written approval has been obtained from the WDNR:

- Removal of the cover;
- replacement of the cover with another barrier;
- excavating or grading of the land surface;
- filling on the cover;
- changing the use or occupancy of the property to single-family residential use;
- plowing for agricultural cultivation; and
- construction or placement of a building or other structure.

If removal, replacement or other changes to the cover are considered, the WDNR shall be contacted at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, or welfare or the environment, in accordance with NR 727.07.

Amendment or Withdrawal of CMP

This CMP shall not be amended or withdrawn without the written approval of WDNR.

Contact Information

Property Owner:	Cristo Rey Milwaukee NMTC SP Attn: Mr. Andrew Stith 1818 W. National Avenue Milwaukee, WI 53214 bdavis@de475.com 414-436-4600
Consultant:	Jim Bannantine, P.G. Consultant Kapur, Inc. 400 E. Wisconsin avenue, Ste. 500 Milwaukee, WI 53202 414-779-0686 jbannantine@kapurinc.com
WDNR:	Linda Michalets Remediation and Redevelopment Program Wisconsin Department of Natural Resources 1027 W. St. Paul Avenue Milwaukee, WI 53233 414-435-8010 Linda.Michalets@wisconsin.gov

D.2 LOCATION MAP

The potential lateral extent of shallow impacted fill material is across the Subject Property. A map depicting the location of the impacted fill is included as **Attachment D.2.**

D.3 PHOTOGRAPHS OF COVER

Photographs documenting the completed cover condition are included in **Attachment D.3.**

Cover Maintenance Plan
Cristo Rey Jesuit HS
February 9, 2023
Page 5

D.4 CONTINUING OBLIGATIONS INSPECTION AND MAINTENANCE LOG

A copy of the cover inspection and maintenance log (WDNR Form 4400-305) is included as **Attachment D.4**. A copy of the manufacturer's maintenance guidelines is included as **Attachment D.4.i**.

* * * * *