D.1. CAP MAINTENANCE PLAN
January 2024

Property Location:
Innovation Park – Lot 3 and Outlot 3
1401 Discovery Parkway
Wauwatosa, WI 53226

WDNR FID #: 341361240
BRRTS #: 02-41-588671

Parcel I.D. #343-1003-000 and #373-1007-000

Legal Description Lot 3 and Outlot 3 of Certified Survey Map No. 9389 in the Southwest ¼ of the Southeast ¼ of Section 20, Township 7 North, Range 21 East, in the City of Wauwatosa, County of Milwaukee, State of Wisconsin.

Introduction
This document is the Cap Maintenance Plan (CMP) for the site located at 1401 Discovery Parkway, Wauwatosa, Wisconsin (the "site") in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code. More specifically, the site is defined by Lot 3 and Outlot 3, which are shown in **Attachment D.2.** (aka **Figure D.2. – Cap Location Map**).

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

- The case file located at the Wisconsin Department of Natural Resources (WDNR) Southeast Region office;
- BRRTS on the Web (DNR's internet-based data base of contaminated sites) https://dnr.wisconsin.gov/topic/Brownfields/WRRD.html; and
- The DNR project manager for Milwaukee County.

Description of Impacts
Soil impacted by polynuclear aromatic hydrocarbons (PAHs) and/or Resource Conservation and Recovery Act (RCRA) metals (selenium) is assumed to be present within reworked soil (fill) across the site. The extent of soil impacts with concentrations greater than the WDNR Chapter NR 720 Residual Contaminant Levels (RCLs) for the protection of human health by direct contact (direct contact) for a non-industrial property and protection of groundwater (groundwater pathway) is limited to PAHs (direct contact and groundwater pathway) and selenium (groundwater pathway only) generally located across the site. The PAH and selenium soil impacts greater than the direct contact and/or groundwater pathway RCLs are located at depths of up to 12 feet below ground surface (bgs) or more. The extent of the remaining residual soil contamination is shown on **Attachment D.2 – Cap Location Map**.

Description of the Cap to be Maintained
Residual PAH and selenium soil contamination requires proper capping in order to effectively reduce human health risks from direct contact exposure and protect groundwater. There are multiple types of engineered barriers that will be utilized at the Site as described below:

- Concrete Building Floor Slab - New building floor slabs at or below the ground level are 6-inches thick.

- Concrete Pavements and Sidewalks - Concrete-paved drive areas are 5-inches thick, while concrete sidewalks and drive approaches are 6-inches thick or more.

- Asphalt Pavements - Asphalt pavement 4-inches thick was used for the outdoor parking and drive areas surrounding the new building / lot and along the entrance drive. The parking rows within the ABB parking lot area are surfaced with permeable brick pavers, constructed of permeable brick approximately 4-inches thick.

- Clean Soil Barrier - Limited landscaped areas are located around the new building and entrance drive, and the paved parking lot. Within the landscaped areas along the southern facade of the office building and within the Outlot 3 parking drive island, the soil cover system consists of a traffic bond warning layer placed over the subgrade soil and capped with 6-inches of clean soil that is compacted with construction machinery and 4 inches of vegetated or mulched topsoil (cover designed per landscaping specifications). Within the landscaped areas north of the office building and south of Outlot 3 along the parking structure ramp, the soil cover system consists of a 6-inch topsoil cap with native plantings and prairie grass. The landscaped areas at the site and within the ABB parking lot incur limited use by site occupants (commercial office workers and maintenance staff).

As part of landscaping activities, some trees and bushes may be planted within the green space areas that will necessitate root balls penetrating through the clean soil cap; however, the root structure and the trees / bushes will prevent direct contact with underlying residual soil impacts. The landscape contractor will be provided a copy of the Soil Management Plan so personnel can be made aware of the underlying soil impacts and employ personal protective equipment as needed; any impacted soil disturbed during the planting of trees or bushes will need to be relocated on-site beneath an engineered barrier or disposed of off-site at a WDNR-licensed landfill.

Based on the current and future use of the property, the engineered barriers should function as intended unless disturbed. The extents of the engineered barriers are depicted on **Attachment D.2**. Photos of the site features are included as **Attachment D.3**.

Inspections

The engineered barriers overlying the impacted soil will be inspected approximately twice a year (semi-annually), normally in the spring after all snow and ice is gone and in the fall, for erosion, damage, deterioration, cracks and other potential problems that can cause additional surface infiltration and 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 erosion, human disturbance, settling, exposure to the weather, wear from traffic, increasing age and other factors. Areas where potentially impacted soils have become or are likely to become exposed will be documented. A log of the inspections and repairs will be maintained by the property owner and is included below as **Attachment D.4**, Inspection Log. The log will include recommendations for necessary repair of 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 kept on-site and available for submittal or inspection by WDNR representatives upon their request.

Maintenance Activities
If problems are noted during the semi-annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Maintenance activities may include, but are not limited to, filling eroded spots in the soil cap, repairs to pavement and building floor slabs, replacing sections of sidewalk, etc. In the event that necessary maintenance activities expose impacted soil, the owner will inform maintenance workers of the potential direct contact exposure hazard. The owner must also sample any soil that is excavated from the site prior to disposal to ascertain if the identified contamination remains. The material must be treated, stored and disposed of by the owner in accordance with applicable local, state, and federal law.

In the event that the concrete floor slabs, concrete / asphalt pavements, concrete sidewalks, , or clean soil barriers overlying the impacted soil at the Site are removed or replaced, the replacement barrier must be equally impervious. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this CMP unless indicated otherwise by the WDNR or its successor.

The property owner, in order to maintain the integrity of the engineered barriers, will maintain a copy of this CMP and make it available to all interested parties (i.e., on-site employees, contractors, landscape companies, future property owners, etc.) for viewing. The property owner will be responsible for maintaining the overall cap systems.

Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover or Cap
The following activities are prohibited on any portion of the property where an engineered barrier is required as shown on the attached map, unless prior written approval has been obtained from the WDNR: 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; or 7) changing the use or occupancy of the property to single-family residential use.

If removal, replacement or other changes to an engineered barrier, or a building which is acting as a cover, are considered, the property owner will contact the WDNR at least 45 days before taking such action to determine whether further action may be necessary t 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 CMP can be amended or withdrawn by the property owner and its successors with the written approval of WDNR.

Contact Information as of January 2024:

Owner Information:

Innovation One Development Partners, LLC (Lot 3)
Innovation Campus Owners Association (Outlot 3)
c/o Irgens
1401 Discovery Parkway, #100
Wauwatosa, WI 53226
Contact: Mr. Timothy Gasperetti, P.E.
Email: tgasperetti@irgens.com

Signature: MRM

Printed Name: Maxwell R. Metz

Title: Project Manager - Irgens

Environmental Consultant:

The Sigma Group, Inc.
1300 W. Canal Street
Milwaukee, WI 53233
Telephone: (414) 643-4200
Contact: Cory Katzban, P.E.
Email: ckatzban@thesigmagroup.com

Wisconsin Department of Natural Resources Project Manager:

Wisconsin Department of Natural Resources
Remediation & Redevelopment Program
2300 N. Martin Luther King Drive
Milwaukee, WI 53212
Contact: Mr. David Hanson
Phone: (414) 639-4156
Email: david.hanson@wisconsin.gov

ENGINEERED BARRIERS LEGEND

- = ENGINEERED CLEAN SOIL BARRIER - LOT 2 (FUTURE) (TRAFFIC BOND BASE LAYER - 12"CLEAN SOIL - 6"TOPSOIL)
- = ENGINEERED CLEAN SOIL BARRIER - LOT 3, OUTLOT 3 & LOT 4 GRASS / PRAIRIE GRASS (6"TOPSOIL - GRASS - LIMITED USE)
- = ENGINEERED CLEAN SOIL BARRIER - LOT 3, OUTLOT 3 & LOT 4 LANDSCAPING (TRAFFIC BOND LAYER - 6" TOPSOIL - LANDSCAPING)
- = EXTERIOR CONCRETE SLABS / PAVEMENT (5"THICK CONCRETE, CURB = 6"THICK CONCRETE)
- = INTERIOR CONCRETE FLOOR SLABS (6"THICK CONCRETE)
- = PAVED ASPHALT PARKING LOT / DRIVE AREAS (4"THICK ASPHALT)
- = PERMEABLE PAVERS (4"THICK BRICK)
- = CONCRETE PADS AND SIDEWALK - ABB PARKING LOT (6-INCH THICK)

LEGEND

- APPROXIMATE PARCEL BOUNDARIES (SIGMA SURVEY)
- APPROXIMATE SITE BOUNDARY (LOT 3 & OUTLOT 3) BRRTS #: 02-41-588671 **EXTENT OF CAP TO BE MAINTAINED**
- APPROXIMATE INNOVATION PARK BOUNDARY (PHASE I) FORMER BRRTS #: 02-41-588671
- EXTENT OF RESIDUAL SOIL IMPACTS GREATER THAN NR 720 RCLs FOR PROTECTION OF GROUNDWATER AND DIRECT CONTACT (NON-INDUSTRIAL) (PAHs)
- EXTENT OF RESIDUAL SOIL IMPACTS GREATER THAN NR 720 RCLs FOR PROTECTION OF GROUNDWATER (SELENIUM)
- ASSUMED EXTENT OF RESIDUAL GROUNDWATER IMPACTS GREATER THAN NR 140 GROUNDWATER QUALITY STANDARDS

THE EXTENT OF RESIDUAL SOIL IMPACTS GREATER THAN NR 720 RCLs AND RESIDUAL GROUNDWATER IMPACTS GREATER THAN NR 140 GROUNDWATER QUALITY STANDARDS IS CORRELATED WITH THE EXTENT OF REWORKED SOIL AND FILL MATERIAL PRESENT SITE-WIDE

THE SIGMA GROUP
Single Source. Sound Solutions.
www.thesigmagroup.com
1300 West Canal Street
Milwaukee, WI 53233
Phone: 414-643-4200
Fax: 414-643-4210

GRAPHIC SCALE
0 50' 100'

ESCHWEILER DRIVE
STORM WATER PONDS
OUTLOT 1 (CSM 9389)
DISCOVERY PKWY (90' PUBLIC RW)
P/L
95.5'
BUILDING A
INNOVATION ONE
OUTLOT 3 (CSM 9389)
1401 DISCOVERY PARKWAY
PARCEL: 3731007000
LOT 3 (CSM 9389)
1401 DISCOVERY PARKWAY
PARCEL: 3731003000
ABB PARKING LOT
LOT 4 (CSM 9389)
1301 DISCOVERY PARKWAY
PARCEL: 3731004000
PARKING STRUCTURE
GRAVEL
OUTLOT 4 (CSM 9389)
PARCEL: 3731008000
STORM WATER PONDS
ABB
1425 DISCOVERY PKWY
PARCEL: 3739999017
LOT 2 (CSM 9389)
1325 DISCOVERY PARKWAY
PARCEL: 3731002000
BUILDING B
OUTLOT 2 (CSM 9389)
LOT 1 (CSM 9389)
9480 WATERTOWN PLANK RD
PARCEL: 3731001000
LOT 3
CSM 8401
TAXKEY:3739999014
LOT 2
CSM 8401
TAXKEY:3739999013
5.0'
8.0'
30.0'
18.5'
22.0'
56.5'
24.0'
49.6'
220.0'
131.0'
17.0'
8.6'
26.0'
20.5'

- 5" THICK CONCRETE WALK
- ASPHALT SURFACE
- GRAVEL PATH
- CURB & GUTTER (ACCEPT)
- CURB & GUTTER (REJECT)
- SECTION 1/4 SECTION LINE
- PROPERTY LINE
- EASEMENT
- CHAIN LINK FENCE
- TREE LINE
- OVERHEAD UTILITY LINE
- ELECTRIC
- TELEPHONE
- FIBER OPTIC
- CABLE TV
- SANITARY SEWER
- FORCE MAIN
- STORM SEWER
- WATER MAIN
- GAS
- EXISTING CONTOUR
- MANHOLE
- CATCH BASIN
- CATCH BASIN (ROUND)
- ROOF DRAIN
- HYDRANT
- WATER VALVE
- GAS VALVE
- UTILITY POLE
- GUY WIRE
- GAS METER
- ELECTRIC METER
- UTILITY PEDESTAL
- TRAFFIC SIGNAL
- LIGHT POLE
- SOIL BORING
- MONITORING WELL
- IRON PIPE FOUND/SET
- REBAR FOUND/SET
- CHISELED CROSS FOUND/SET
- PK NAIL FOUND/SET
- SPIKE/NAIL
- MONUMENT
- BENCHMARK
- SIGN
- DECIDUOUS TREE
- CONIFEROUS TREE
- BUSH
- POST

INNOVATION PARK DEVELOPMENT NOTES:
LOT 1: REDEVELOPMENT NOT STARTED (AS OF APRIL 2023)
LOT 2: REDEVELOPMENT NOT STARTED (AS OF APRIL 2023)
LOT 3: REDEVELOPMENT COMPLETED (JANUARY 2023)
LOT 4: REDEVELOPMENT COMPLETED (JANUARY 2023)
OUTLOT 1: COMPLETED BY OTHERS (STORMWATER POND)
OUTLOT 2: COMPLETED BY OTHERS (STORMWATER POND)
OUTLOT 3: REDEVELOPMENT COMPLETED (JANUARY 2023)
OUTLOT 4: COMPLETED BY OTHERS (STORMWATER PONDS)

BASE MAP: SITE DIM PLAN - SHEET C100 - THE SIGMA GROUP, INC. (MAY 2021)

LOT 3 & OUTLOT 3
INNOVATION PARK
WAUWATOSA, WISCONSIN

CAP LOCATION MAP

DRAWING NO.	18518-CUTFILL.DWG
DRAWN BY:	RCR
DATE:	8/23/2021
PROJECT NO:	18518
CHECKED BY:	TPM
APPROVED BY:	CTC

FIGURE

D.2.

Project: 18518 | Directory: CAD/Env | Filename: 18518 Master Map-ClosureLot3Outlot3.ai | Created By: CCK | Date: 10/23/2023

ENGINEERED BARRIER PHOTOGRAPHS

Photo 1: Construction of greenspace cap (foreground) and asphalt pavement / concrete curb and gutter cap (mid-background) within Outlot 3 area of the site.
View to north; photograph taken on December 21, 2022.

Photo 2: Construction of greenspace cap (foreground) and concrete paved sidewalk (foreground) and patio space (background) of Lot 3 area of the site (east side of Lot 3).
View to northwest; photograph taken on December 21, 2022.

Photo 3: Construction of concrete paved patio space of Lot 3 area of the site (east side of Lot 3) with surrounding mulched landscaping (greenspace).
View to north; photograph taken on December 21, 2022.

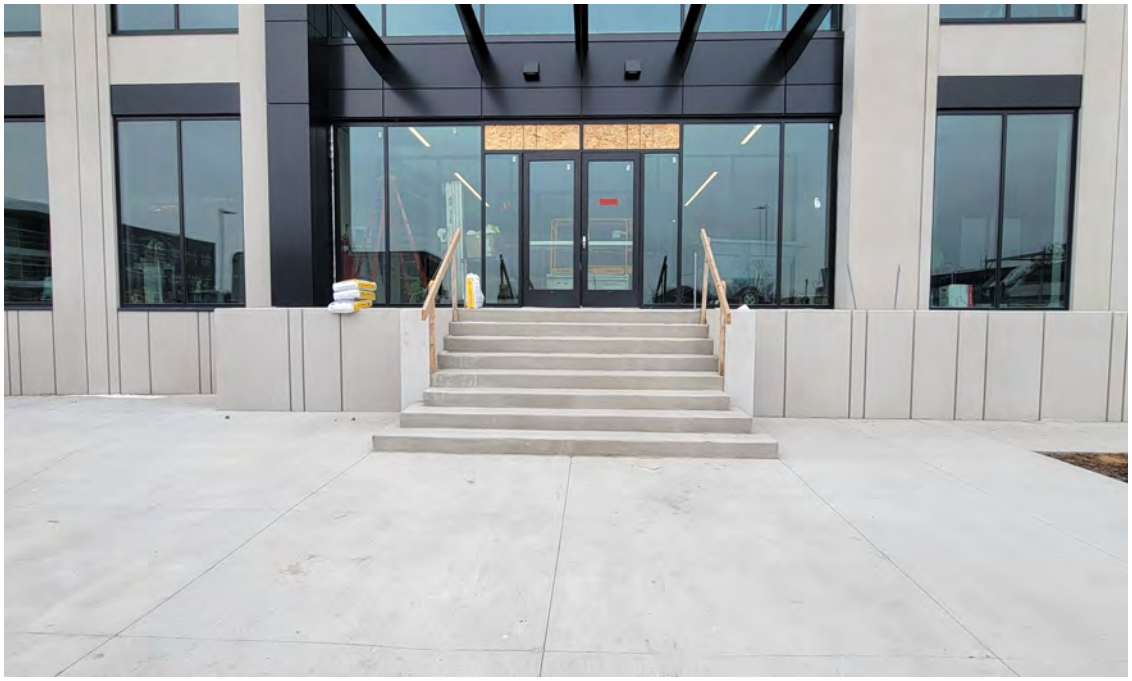

Photo 4: Concrete paved sidewalk and entrance area to the Lot 3 Building A. Concrete plaza space leading up concrete stairs into a concrete slab building.
View to north; photograph taken on December 21, 2022.

ENGINEERED BARRIER PHOTOGRAPHS

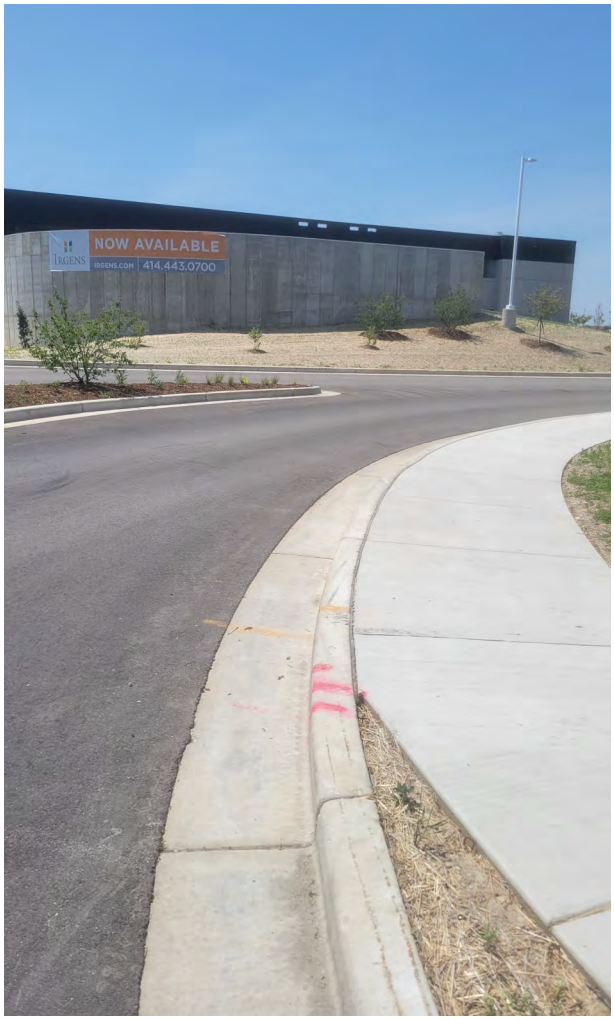

Photo 5: Concrete curb and gutter and sidewalk along the north side of Outlot 3 entrance driveway into the site. Limited greenspace (mulched or grass) within median and along sidewalk.
View to southwest; photograph taken on June 1, 2023.

Photo 6: Asphalt paved entrance to Lot 3 and driveway along Building A. Concrete curb and gutter and sidewalk along the south side of Lot 3.
View to west; photograph taken on June 1, 2023.

ENGINEERED BARRIER PHOTOGRAPHS

Photo 7: Greenspace along south side of Outlot 3. Cap consists of 6-inches of topsoil with native prairie grass plantings and small trees. Limited use.
View to east; photograph taken on June 1, 2023.

Photo 8: Asphalt paved entrance to Lot 3 and driveway along Building A.
View to west; photograph taken on June 1, 2023.

ENGINEERED BARRIER PHOTOGRAPHS

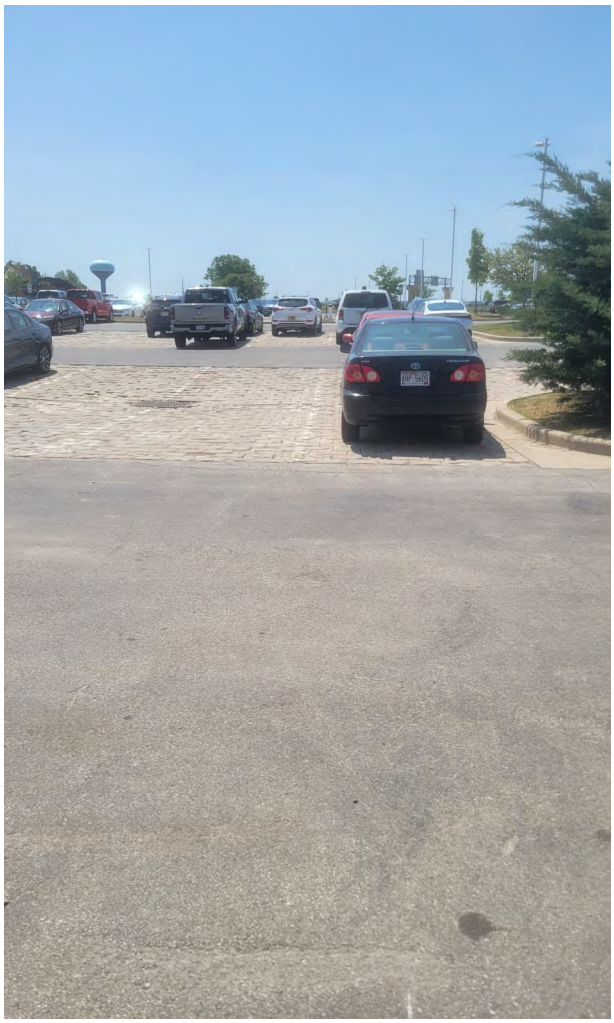

Photo 9: Asphalt paved parking lot of Lot 3 (east of ABB building). Permeable pavers along parking rows of ABB parking lot.
View to south; photograph taken on June 1, 2023.

Photo 10: Greenspace cap along north side of Lot 3 and Building A area. Cap consists of 6-inches of topsoil with native prairie grass plantings and small trees. Limited use.
View to northeast; photograph taken on June 1, 2023.

ENGINEERED BARRIER PHOTOGRAPHS

Photo 11: Asphalt paved parking lot within northwest portion of Lot 3 (east of ABB building). Permeable pavers along parking rows of ABB parking lot.
View to east; photograph taken on June 1, 2023.

Photo 12: Asphalt paved parking lot within western portion of Lot 3 (east of ABB building). Permeable pavers along parking rows of ABB parking lot.
View to north; photograph taken on June 1, 2023.

ENGINEERED BARRIER PHOTOGRAPHS

Photo 13: Asphalt paved parking lot within eastern portion of Lot 3 (east of ABB building). Permeable pavers along parking rows of ABB parking lot. Mulched and vegetated topsoil cover within greenspace islands (limited use).
View to west; photograph taken on June 1, 2023.

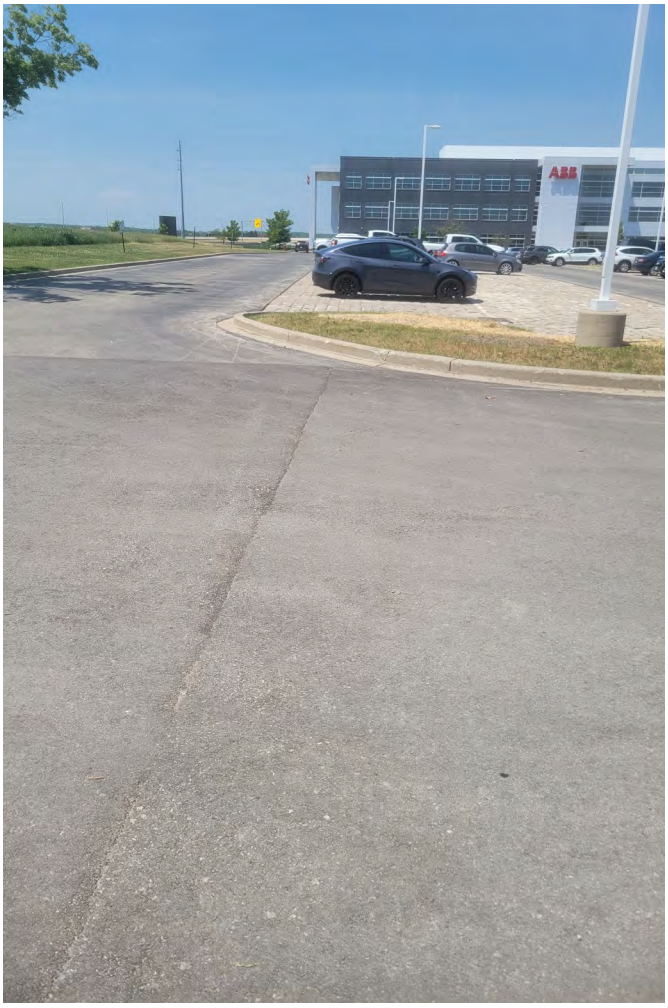

Photo 14: Asphalt paved parking lot within southeastern portion of Lot 3 (east of ABB building). Permeable pavers along parking rows of ABB parking lot. Mulched and vegetated topsoil cover within greenspace islands (limited use).
View to west; photograph taken on June 1, 2023.

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

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (2/14)

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	BRRTS No.
Innovation Park - Lot 3 and Outlot 3	02-41-588671

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):

david.hanson@wisconsin.gov

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?
06/01/2023	The Sigma Group, Inc.	☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Greenspace and Native Plants	None: new construction, in good condition. No recommendations for repair or maintenance.	○ Y ◉ N	◉ Y ○ N
06/01/2023	The Sigma Group, Inc.	☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Concrete Pavements and Building Floor Slabs	None: new construction, in good condition. No recommendations for repair or maintenance.	○ Y ◉ N	◉ Y ○ N
06/01/2023	The Sigma Group, Inc.	☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Asphalt Pavements	None: new construction, in good condition. Existing ABB parking lot asphalt pavement in good condition. No recommendations for repair or maintenance.	○ Y ◉ N	◉ Y ○ N
06/01/2023	The Sigma Group, Inc.	☐ monitoring well ☒ cover/barrier ☐ vapor mitigation system ☐ other:	Permeable Pavers (ABB Parking Lot Parking Spaces)	None: aging, in fair condition, but not compromised as a cap to prevent direct contact. No recommendations for repair or maintenance.	○ Y ◉ N	◉ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N
		☐ monitoring well ☐ cover/barrier ☐ vapor mitigation system ☐ other:			○ Y ○ N	○ Y ○ N

{Click to Add/Edit Image}	Date added:
Title:	

{Click to Add/Edit Image}	Date added:
Title:	