State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1027 W. Saint Paul Avenue
Milwaukee WI 53233

Tony Evers, Governor

Telephone 608-266-2621
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November 26, 2024

Mr. Patrick Schloss
City of West Allis
7525 West Greenfield Avenue
West Allis, WI 53214
Via Electronic Mail to: pschloss@westalliswi.gov.

Subject: Approval to Manage Contaminated Soil under Wis. Admin. Code § NR 718.12 at a Different Site or Facility.

Generating Property: Former Teledyne Industries Site, 52 West Burnham Street, West Allis, WI 53219
BRRTS #: 02-41-556802, FID #: 241008900.

Receiving Property: West Allis Transfer Station, 5032 West Rogers Street, West Allis, WI 53219
BRRTS #: 02-41-594132, FID #: 341368390.

Dear Mr. Schloss:

On October 10, 2024, Michelle Peters of Ramboll Americas Engineering Solutions, Inc. (Ramboll), submitted a *NR 718 Request for Off-Site Management of Impacted Soil* (MMP), on your behalf requesting to manage 5,650 cubic yards of contaminated soil on the West Allis Waste Transfer Station Site in accordance with Wis. Admin. Code § NR 718.12. Additional information regarding this request was also provided on October 29, 2024. The Wisconsin Department of Natural Resources (DNR) received all applicable technical assistance and database fees for providing review and response, in accordance with Wis. Admin. Code § NR 749.04 (1). It's the understanding of the DNR that the City of West Allis is the owner of both the Former Teledyne Industries (generating) and the West Allis Waste Transfer Station (receiving) properties.

The DNR has also received a *Historic Fill Exemption Request* (BRRTS #: 07-41-595629) on October 10, 2024, and is currently being reviewed.

The generating site is planned to be developed as a new facility to house vehicle parking and office and maintenance operations of the City of West Allis Department of Public Works (DPW). The receiving property is planned to be redeveloped as an ancillary cold storage and paved areas in support of the new City of West Allis DPW facility on the adjoining generating property. It will also include an unoccupied slab-on-grade cold storage structure as well as installation of new asphalt or concrete-paved areas, which will act as a direct contact barrier.

The City of West Allis is planning construction of utility trenches on the generating property. Soil will be excavated, transported and relocated from the generating site to the reciving site, using conventional earthwork equipment. The maximum depth of proposed excavtion within the reuse areas is 11 feet below ground surface (bgs) to accommodate the underground stormwater management system beneath the west parking lots and beneath the eastern/southeastern driveway areas. The maximum depth for placement of relocated soils is anticipated to be approximately 4 feet bgs for general gradintg at the receiving property, which will occur prior to construction of the proposed direct contact barrier.

The DNR previously approved the NR 718 Request on May 17, 2024 for materials generated at the generating site to be managed within the same site in designated fill areas. The NR 718 Request is seeking approval for management of the same material (same locations and maximum depths) which has been beeen previously approved for re-location within the generating site to also be re-located to the receiving site. It is estimated that 5,650 cubic yards of materials contaminated with volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated bipheyls (PCBs) and Resource Conservation and Recovery Act (RCRA) metals will need to be removed and re-located to the receiving site. An approval through Wis. Admin. Code NR 718.12 has been requested to manage the contaminated soil off site (receiving property) at the West Allis Waste Transfer Station where it will be used for general grading.

Wis. Admin. Code § NR 718.12 Approval

This letter grants an approval to manage contaminated soil under Wis. Admin. Code § NR 718.12. Approval is based on the following:

Compliance with Locational Criteria

Managing contaminated soil in areas of the site identified on the attached (Figure 8A: *City of West Allis Department of Public Works (DPW)Redevelopment, Former Teledyne Industries & Waste Transfer Station Properties, 52** West Burnham Street, West Allis, Wisconsin - Cut/Fill* Heat Map, and Figure 8B: *City of West Allis DPW Redevelopment, Former Teledyne Industries & Waste Transfer Station Properties, 52** West Burnham Street, West Allis, Wisconsin - NR 718 Cut & Fill Areas),* included in the MMP received on October 10, 2024, will meet the locational criteria listed under Wis. Admin. Code § NR 718.12 (1) (c), except for the following:

- Within 300 feet of any navigable river, stream, lake, pond or flowage; and
- Within 3 feet of the high groundwater level,

Grant of exemption to Wis. Admin. Code § NR 718.12 (1) (c) (#s 3 and 5)

In consideration of the proposed remedial response (capping), the DNR grants an exemption to the location criteria of Wis. Admin. Code § 718.12 (1) (c) (#s 3 and 5) and will allow placement of contaminated soil material within 300 feet of any navigable river, stream, lake, pond or flowage and within 3 feet of the high groundwater level.

Characterization of Soil to be Excavated

Soil samples were collected for analysis of contaminants previously detected or expected to be present at this site including VOCs, PAHs, PCBs and RCRA metals, from areas most likely to contain residual contamination. Based on an estimated volume of 5,650 cubic yards of material, and a sampling frequency of one sample per 942 cubic yards, the sampling protocol described in Wis. Admin. Code § NR 718.12 (1) (e) was not met. However, the DNR has determined that the soil was adequately characterized for management under this approval due to soil homogeneity.

As indicated above, the DNR previously approved the NR 718 Request on May 17, 2024, for material generated at the Former Teledyne site to be managed within the same site in designated fill areas. This NR 718 Request is seeking approval for management of similar material which has been previously approved for re-location within the Former Teledyne Industries (generating site) to also be re-located to the West Allis Waste Transfer Station (receiving site). Thus, soil was deemed to be adequately characterized.

Submittal of a Soil Management Plan
A complete soil management plan, as defined by Wis. Admin. Code §§ NR 718.12 (2) (b) and (c), was provided to the DNR.

Assessment of Risk Posed by Soil Management
The proposed management of contaminated soil at the West Allis Waste Transfer Station is expected to meet the criteria of Wis. Admin. Code §§ NR 726.13 (1) (b) 1. to 5.

Notice Provided Prior to Commencing Soil Management Activities
Per Wis. Admin. Code § NR 718.12 (2), the DNR was provided with written notice at least seven days prior to commencing the proposed contaminated soil management.

Requirement of Continuing Obligations
You have acknowledged that the continuing obligations described below will be required as a condition of managing the contaminated soil on their property as proposed.

The current property owner of the West Allis Waste Transfer Station, and any subsequent property owners, must comply with the following continuing obligations at this site, established under Wis. Admin. Code § NR 718.12 (2) (d), to ensure that conditions will remain protective. DNR staff will conduct periodic, pre-arranged inspections to ensure that the conditions included in this letter and Barrier Maintenance Plan, dated October, 2024, are met. If these requirements are not followed, the DNR may take enforcement action under Wis. Stat. ch. 292.11 to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Documents submitted to the DNR to request the Wis. Admin. Code § NR 718.12 approval meet the requirements of Wis. Admin. Code § NR 718.12 (2) (e) and are available in PDF on the DNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) and RR Sites Map (RRSM), to provide public notice of remaining contamination and continuing obligations. Both BOTW and RRSM are available at dnr.wi.gov and search "WRRD."

More information on responsibilities related to continuing obligations can be found in the DNR publication "Continuing Obligations for Environmental Protection" (RR-819), which can be found at dnr.wi.gov, search "RR-819."

Please send written notifications and inspection reports, in accordance with the following requirements to:

Wisconsin Department of Natural Resources
Remediation and Redevelopment Program
1027 W. Saint Paul Avenue
Milwaukee, WI 53233
Attn: Environmental Program Associate

Send documents 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 contact below or 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).

More information on submitting electronic documents can be found in the DNR publication "Guidance for Electronic Submittal for the Remediation and Redevelopment Program" (RR-690), which can be found at dnr.wi.gov, search "RR-690."

Residual Soil Contamination

If contaminated soil and solid waste that was managed as proposed in the MMP, is excavated in the future, the property owner at the time of excavation will have the following responsibilities per Wis. Admin. Code § NR 727.05 (1) (d):

- determine if contamination is present;
- determine whether the soil is considered solid or hazardous waste; and,
- ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules.

Excavated contaminated soil may be managed in accordance with Wis. Admin. Code § NR 718 with DNR pre-approval. In addition, all current and future property owners and occupants of the property and right-of-way holders need to be aware that excavation of the contaminated soil may pose a hazard, and special precautions may be necessary to prevent a health threat to humans.

If material that will be managed under this approval includes solid waste other than soil, it may be required to obtain approval from the DNR prior to excavating the waste or constructing any structure over the materials per Wis. Admin. Code § NR 506.085.

The location(s) where contaminated soil and solid waste is proposed to be managed at West Allis Waste Transfer Station is depicted on the attached (Figure 8A: *City of West Allis Department of Public Works (DPW)Redevelopment, Former Teledyne Industries & Waste Transfer Station Properties, 52** West Burnham Street, West Allis, Wisconsin - Cut/Fill* Heat Map, and Figure 8B: *City of West Allis DPW Redevelopment, Former Teledyne Industries & Waste Transfer Station Properties, 52** West Burnham Street, West Allis, Wisconsin - NR 718 Cut & Fill Areas),* included in the MMP received on October 10, 2024.

Depending on site-specific conditions, construction over contaminated soil or groundwater may also result in vapor migration of contaminants into enclosed structures or migration along underground utility lines. The potential for vapor intrusion and means of mitigation may need to be evaluated when planning any future redevelopment, and measures may need to be taken to ensure the continued protection of public health, safety, welfare and the environment at the site.

The DNR's approval prior to well construction or reconstruction is required where contaminated soil was managed, in accordance with Wis. Admin. Code § NR 812.09 (4) (w). This requirement applies to private drinking water wells and high-capacity wells. To obtain approval, complete and submit DNR Form 3300-254 to the DNR Drinking and Groundwater Program's regional water supply specialist. This form is available at dnr.wi.gov, search "3300-254."

Maintenance of a Cover

An engineered barrier is proposed to be installed and maintained over contaminated soil and solid waste that will be managed at West Allis Waste Transfer Station site as proposed in the MMP. The Barrier Maintenance Plan, October, 2024, is attached, which describes the inspection and maintenance activities that will apply to the proposed barrier. An updated maintenance plan must be provided to the DNR once the barrier has been constructed if changes are required and must address actual site conditions per Wis. Admin. Code § NR 724.15

(3) (h). A map is attached which shows where contaminated soil and solid waste is proposed to be managed and the extent of the proposed cover. Once constructed, inspections of the engineered barrier will be required per Wis. Admin. Code § NR 724.13), and submittal of inspection reports may also be required per Wis. Admin. Code § 727.05 (1) (b) 3. Notification to the DNR is required before changing to a non-industrial use if the cover is approved for industrial land use, per Wis. Admin. Code § NR 727.07 (3) to ensure that the cover will be protective for that use.

The Barrier Maintenance Plan prohibits certain activities in areas where maintenance of a cover or barrier is intended to prevent contact with any remaining soil contamination and solid waste. The following activities are prohibited on any portion of the property where the engineered barrier is required, unless prior notification is provided to DNR to determine whether further action may be necessary to protect human health, safety, or welfare of the environment (§ NR 727.07):

- removal of the existing barrier or cover;
- replacement with another barrier or cover;
- excavating or grading of the land surface;
- filling on covered 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.

Use of Industrial Land Use Soil Standards

Direct contact risk posed by contaminated material managed under this approval was assessed using residual contaminant levels for industrial land use. The DNR must be notified if the property land use will change from industrial use to a non-industrial land use per Wis. Admin. Code § NR 727.07 (3). Additional investigation and remediation may be required prior to the change in land use to ensure the site conditions are protective for the planned land use.

Vapor: Future Actions to Address Vapor Intrusion

Chlorinated VOCs are present in material proposed to be managed on the West Allis Waste Transfer site in the MMP at levels that may be of concern for vapor intrusion in the future. The location(s) where this contaminated material is proposed to be managed are depicted on the attached (Figure 8A: *City of West Allis Department of Public Works (DPW)Redevelopment, Former Teledyne Industries & Waste Transfer Station Properties, 52** West Burnham Street, West Allis, Wisconsin - Cut/Fill* Heat Map, and Figure 8B: *City of West Allis DPW Redevelopment, Former Teledyne Industries & Waste Transfer Station Properties, 52** West Burnham Street, West Allis, Wisconsin - NR 718 Cut & Fill Areas),* included in the MMP received on October 10, 2024.

While vapor intrusion does not currently exist, if a building is constructed or reconstructed on this property, or if use of an existing building is changed to a non-industrial use, vapor intrusion may become a concern. The DNR must be notified before construction of a building or changing the use of an existing building to non-industrial use per Wis. Admin. Code § NR 727.07. The use of vapor control technologies or an assessment of the potential for vapor intrusion will be required at that time per Wis. Admin. Code §§ NR 722.15 (2) (e) 4 and 5.

Other Information

1) Any hazardous substance discharge discovered during soil management activities must be reported to the DNR following the requirements of Wis. Admin. Code ch. NR 706.

2) Contaminated soil management activities approved by this letter are scheduled to be completed within one year. Notify the DNR if this schedule will change.
3) Unless otherwise directed by the DNR, documentation of contaminated soil management activities shall be provided within 60 days of the completion of this project (Wis. Admin. Code § NR 724.15 (1)). The documentation must comply with the requirements of Wis. Admin. Code § NR 724.05 (2) and § NR 724.15 (3). Documentation must include:

    a. A cover letter that contains the information required by Wis. Admin. Code § NR 724.05(2) (e) 1.
    b. Owner contact and property location information for the West Allis Waste Transfer Station site.
    c. Maps, drawings and cross sections that depict how contaminated soil was managed.
    d. A synopsis of the work conducted and an explanation as to how it complied with the soil management plan and the conditions in this approval.
    e. A description of any changes made to the planned management activity and an explanation as to why they were necessary for the project.
    f. Any field observations or results of monitoring conducted during the management activity.
    g. A description of how new site conditions are protective of human health, safety, welfare and the environment at the West Allis Waste Transfer Station.
    h. A revised cover maintenance plan, if needed.

    The DNR will request that incomplete documentation be amended as allowed by Wis. Admin. Code § NR 724.07 (2).

4) This approval is granted under Wis. Admin. Code § NR 718.12 and applies only to the specific activities described within the submitted MMP. Any contaminated material that is excavated or otherwise disturbed at the Former Teledyne Industries site and The West Allis Transfer Station site, not covered under this or another approval, must be managed in compliance with the requirements of Wis. Admin. Code chs. NR 500 through NR 599. The management of contaminated material on a property that does not comply with these rules may be considered a hazardous substance discharge or environmental pollution and would be required to be addressed by the process outlined in Wis. Admin. Code chs. NR 700 to NR 799.

5) The city of West Allis is responsible for obtaining any local, federal or other applicable state permits to carry out the project.

All remediation sites are included in DNR's Bureau of Remediation and Redevelopment Tracking System (BRRTS) database. All documents and project milestones related to the cleanup of each of the involved sites are listed in the database entry identified by BRRTS activity #(s) 02-41-556808 and 02-41-594132. Actions relating only to the management of contaminated soil at the West Allis Waste Transfer Station site are tracked in the BRRTS system under activity # 15-41-595593.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this approval decision, please contact the DNR Project Manager, Eric Amadi, by calling (414) 405-0752 or by email at eric.amadi@wisconsin.gov.

Approval to Manage Contaminated Soil at a Different Site or Facility
West Allis Waste Transfer Station
BRRTS #s: 02-41-556802 and 02-41-594132
November 26, 2024

Sincerely,

Timothy G. Alessi, P.G.
Southeast Region Team Manager
Remediation & Redevelopment Program
Milwaukee Service Center

Attachments:

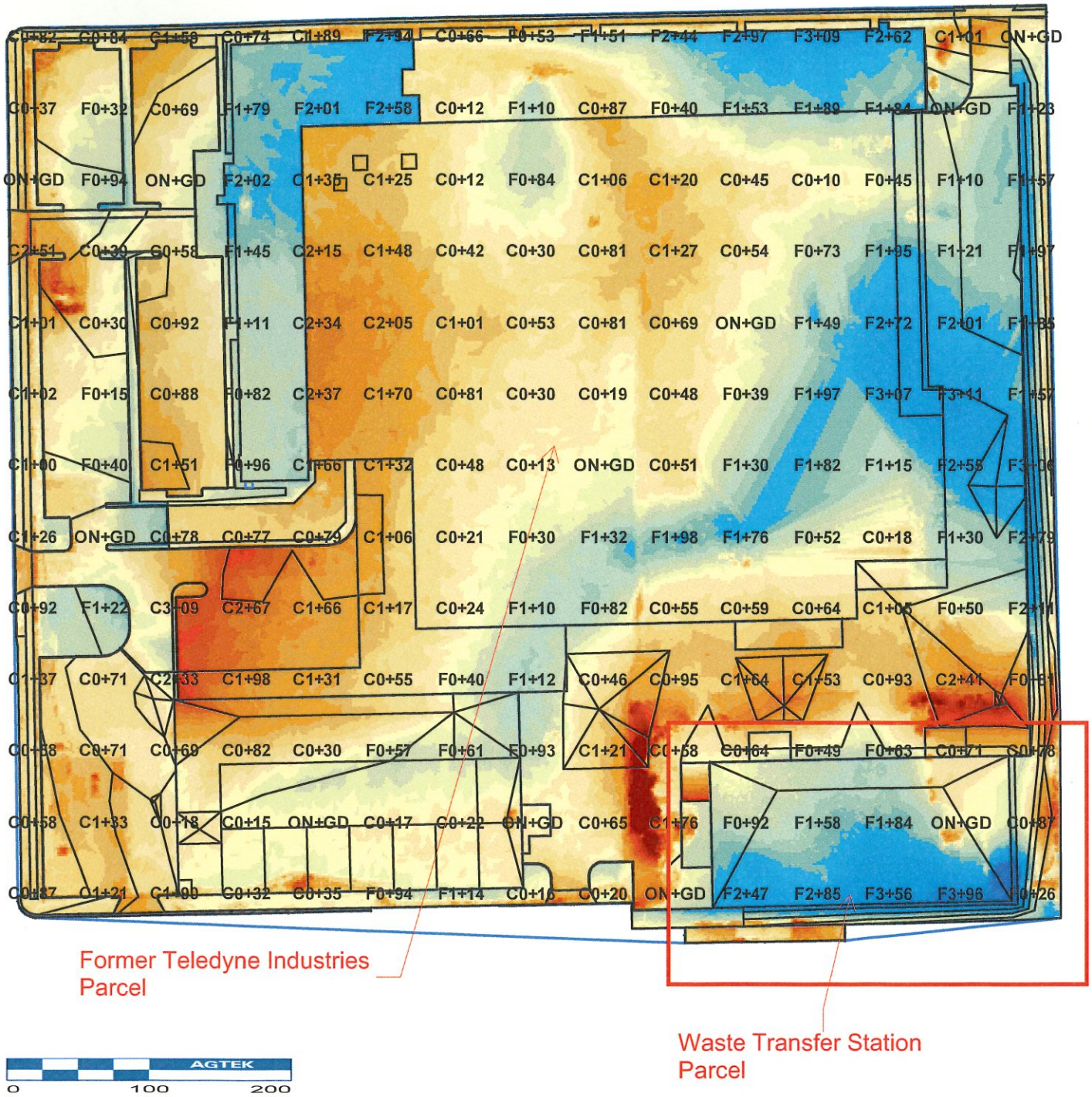
- Figure 8A: Cut-Fill Heat Map (included in MMP received on 10/10/2024).
- Figure 8B, NR 718 Cut & Fill Areas (included in MMP received on 10/10/2024.
- Barrier Maintenance Plan, 10/2024.
- Figure D.2, Proposed Barrier Configuration, 10/07/2024.

cc: Michelle Peters - Ramboll (mpeters@ramboll.com)
SER Case File: FID #s: 241008900 and 341368390.

City of West Allis Department of Public Works Redevelopment
Former Teledyne Industries & Waste Transfer Station Properties
52 West Burnham Street, West Allis, Wisconsin**

Figure 08A - Cut/Fill Heat Map

Blue represents fill areas ("F"), red represents cut areas ("C")



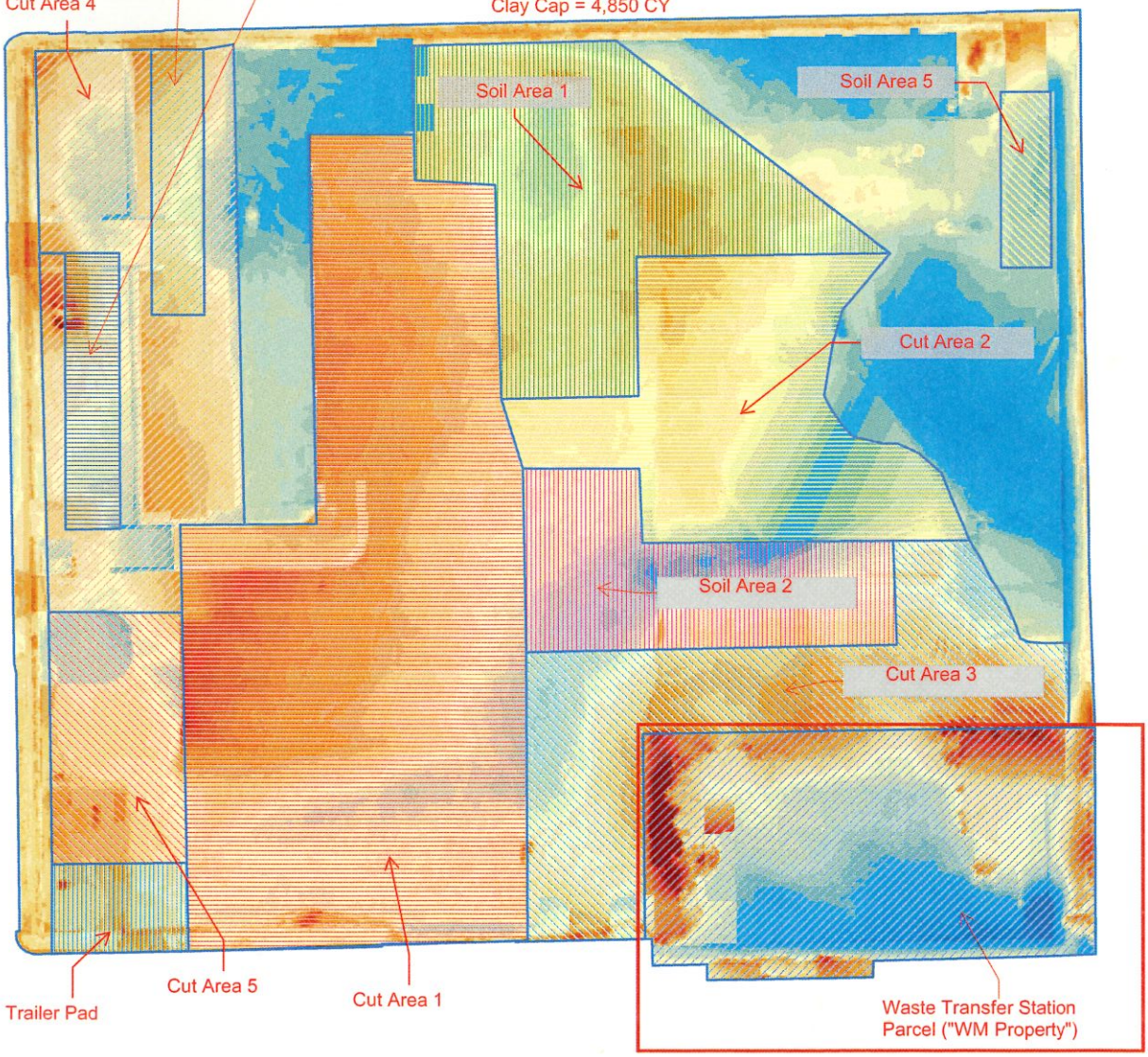
City of West Allis Department of Public Works Redevelopment
Former Teledyne Industries & Waste Transfer Station Properties
52** West Burnham Street, West Allis, Wisconsin`
Figure 08B - NR 718 Cut & Fill Areas

Job: West Allis DPW 7-23-24 Topo VS Subgrade
Units: Ft-CY
Thu Jul 25, 2024 08:51:28 Page 1

Haul Report
Subgrade vs Existing

	Total	Area Cut	Area Fill	OnGrade	Volume Cut	Volume Fill	Fill Factor	Haul Distance	Average Slope	Export -Import
Cut Area 1	98,340	74,587	13,558	10,195	3,582	232	1.00	183	0.1%	3,350
Cut Area 2	35,679	16,036	16,837	2,806	337	688	1.00	124	-0.9%	-351
Cut Area 3	36,916	26,916	7,750	2,250	1,068	230	1.00	81	-0.7%	838
Cut Area 4	35,268	20,467	11,818	2,983	692	333	1.00	30	-0.3%	359
Cut Area 5	15,442	10,991	3,632	819	317	114	1.00	87	0.4%	203
Cut Sub:	**221,645**	**148,997**	**53,595**	**19,053**	**5,996**	**1,597**		**125**	**-0.2%**	**4,399**
Soil Area 1	39,420	28,611	7,662	3,147	728	187	1.00	56	-0.4%	541
Soil Area 2	21,952	6,090	13,003	2,859	103	457	1.00	72	-1.3%	-354
Soil Area 3	6,886	3,375	1,925	1,586	99	25	1.00	88	-0.1%	74
Soil Area 4	6,376	5,025	730	621	133	10	1.00	36	-0.1%	123
Soil Area 5	4,028	0	4,013	15	0	200	1.00	0	0.0%	-200
Soil Sub:	**78,662**	**43,101**	**27,333**	**8,228**	**1,063**	**879**		**59**	**-0.6%**	**184**
Trailer Pad	5,512	5,411	12	89	183	0	1.00	26	4.6%	183
WM Property	48,822	20,259	26,310	2,253	1,343	1,663	1.00	83	-1.1%	-320
Regions Total	**354,641**	**217,768**	**107,250**	**29,623**	**8,585**	**4,139**		**103**	**-0.4%**	**4,446**

Fill = 9,026 * 15% = 10,380 CCY
BLDG 5 Site Fill = 1,663 * 15% = 1,910 CCY (use utility spoils)
Avail Cut (re-usable material) = 1,063 EV
Fill Needed after available site cut is used = 9,317 CCY - BLDG 5 = 7,407 CCY
Area 3 & 4 Borrow = 800 (area 3) + 750 (area 4) = 1,550 EV
Import Needed = 5,857 CCY
Total Haul Off = 9,519 EV - 1,063 CY = 8,456 EV
Clay Cap = 4,850 CY



AGTEK
0 77.1 154.2

ATTACHMENT D

BARRIER MAINTENANCE PLAN

Date: October 2024

Property Located at: West Allis Waste Transfer Station
5032 West Rogers Street, West Allis, WI 53219

BRRTS No. 02-41-594132, FID No. 341368390

Legal Description: Part of the Northwest ¼ of the Fractional Southeast ¼ in Section 2, Township 6 North, Range 21 East, in the City of West Allis, Milwaukee County, Wisconsin.
Parcel Identification No. 474-0003-000

INTRODUCTION

This document is the Barrier Maintenance Plan for the former West Allis Waste Transfer Station soil barrier consisting of a building structure and paved areas at 5032 West Rogers Street, West Allis, Wisconsin, in accordance with the requirements of s. NR 724.13 (2), Wisconsin Administrative Code (WAC). The maintenance activities relate to the proposed site direct contact barrier which will address and occupy the area over the soils partially affected with volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals above their respective WAC NR 720 Residual Contaminant Levels (RCLs).

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

- the case file in the WDNR Southeast office;
- BRRTS on the Web (WDNR'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 WDNR project manager for Milwaukee County.

D.1. Descriptions

Description of Contamination

The site is contaminated from the historical emplacement of urban fill soils during the initial development of the site, including in the former Kinnickinnic Creek Channel. The extent of low-level contamination is widespread across the site due to the nature of the fill. PAHs, RCRA metals, and PCBs were detected in fill/soil, considered to extend to the property boundaries, at concentrations exceeding Wisconsin Administrative Code (WAC) NR 720 Groundwater Pathway and Non-Industrial Direct Contact Residual Contaminant Levels (RCLs), in addition to arsenic detections exceeding the WAC NR 720 Industrial Direct Contact RCL. In limited areas of the site, PAHs and lead have been detected exceeding the WAC NR 720 Industrial Direct Contact site. VOCs have been detected exceeding the WAC NR 720 Groundwater Pathway RCLs in a limited northwestern portion of the site, within the former backfilled creek channel.

Fill thickness on the site has been documented to be between 4 to 12 feet of re-worked soil/fill material. The observed depth of fill was greatest, approximately 10 to 12 feet, in soil brings advanced in the extent of the former Kinnickinnic Creek Channel. The fill material encountered in borings consisted of sandy gravel and gravelly sandy slit with trace to some organics. Debris encountered within the fill included trace such as brick, broken glass, ceramic, and metal. These observed fill materials are not methane-generating. Native

silty clay was observed under fill. No organic clays or other methane-generating soils have been observed at the site.

Benzene has been detected in the groundwater above the Enforcement Standard (ES) at two wells in the northwestern corner, and above the Preventative Action Limit (PAL) in four of the five wells. Several other VOCs and metals have been detected above their respective PALs in the four wells near the former Kinnickinnic Creek Channel. Groundwater contamination appears to be localized to the northwestern corner of the site, within and adjacent to the former Kinnickinnic Creek Channel and likely associated with the fill material used to backfill the former channel and northwestern portion of the site.

Soil vapor samples were not collected on the site. A vapor intrusion assessment was performed due to the presence of PVOCs, which concluded that vapor intrusion into existing structures is not a concern at the site. Future redevelopment of the site will not include the construction of any occupied buildings for which vapor mitigation measures would be warranted.

Description of the Barrier to be Maintained

The proposed site barrier is an ancillary unoccupied cold storage structure in support of the new Department of Public Works (DPW) facility for the City at the adjoining Former Teledyne Industries site. It will include an unoccupied slab-on-grade cold storage structure as well as installation of new asphalt- or concrete-paved areas, which will act as a direct contact barrier.

The proposed structures will be slab-on-grade construction with concrete foundations and building slabs. The structure foundation slab will be constructed with 4 to 8 inches thick concrete and will be underlain by 4 to 8 inches of crushed aggregate base course. As the proposed redevelopment of an ancillary cold storage structure will not include the construction of any occupied building, no vapor mitigation measures are warranted in accordance with guidance provided in WDNR guidance document RR-800. Asphalt parking/driveway areas along the northern and western portions of the site will consist of 4 to 6 inches of asphalt over 8 to 12 inches of crushed aggregate base course layer.

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

Cover/Building/Slab/Barrier Purpose

The proposed building and paved areas overlying the contaminated soils serve as a barrier to prevent direct human contact with the residual soil contamination present at the site that might otherwise pose a threat to human health.

Inspection

The proposed barrier overlying contaminated soil at the site, as depicted in Figure D.2, will be inspected regularly. The building will be inspected annually for signs of deterioration, cracks, leaks, and other issues. The pavement will be inspected annually 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. Vegetation and landscaped areas will also be inspected annually.

The inspections will be performed by the property owner or its designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age, and other factors. Any area where contaminated soil has become or is likely to become exposed will be documented.

A log of the inspections and any repairs will be maintained by the property owner and is included as Attachment D.4, Form 4400-305, Continuing Obligations Inspection and Maintenance Log. The log will include recommendations for necessary repair of any areas where underlying soils are exposed. If repairs are completed, they will also be documented in the inspection log. A copy of the Barrier Maintenance Plan and inspection log will be kept at the site.

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 possible. Repairs can include patching and filling, larger resurfacing, or construction operations. If maintenance activities expose the underlying contaminated 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 that any part of the overlying soil barrier is removed or replaced, the replacement barrier must be equally protective. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Barrier Maintenance Plan unless indicated otherwise by the WDNR or its successor.

In order to maintain the integrity of the overlying soil barrier, the property owner will maintain a copy of this Barrier Maintenance Plan at the site and will 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 WDNR Prior to Actions Affecting a Cover/Barrier

The following activities are prohibited on any portion of the property where buildings, pavement or vegetated soil cover 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 the removal, replacement, or other changes to an overlying barrier are considered, the property owner will contact the WDNR at least 45 days before taking such an action, to determine whether further action may be necessary to protect human health, safety, welfare, or the environment, in accordance with s. NR 727.07, WAC.

Amendment or Withdrawal of Barrier Maintenance Plan

This Barrier Maintenance Plan can be amended or withdrawn by the property owner and its successors with written approval of the WDNR.

Contact Information as of October 2024

Site Owner and Operator:	City of West Allis 7525 West Greenfield Avenue West Allis, WI 53214 Contact: Patrick Schloss, (414) 302-8468

Signature: _____

Patrick Schloss, Executive Director of Development

Consultant: Ramboll Americas Engineering Solutions, Inc.
234 W. Florida Street, Fifth Floor
Milwaukee, WI 53204
Contact: Michelle Peters, (262) 901-0133

Agency: Wisconsin Department of Natural Resources
1027 West St. Paul Avenue
Milwaukee, WI 53233
Contact: Eric Amadi, (414) 405-0752

D.2 Location Maps

Location maps providing proposed barrier, location of proposed barrier, extent of barrier to be maintained, extent and type of residual contamination, and all property boundaries are provided as Attachment D.2.

D.3 Photographs of Cover/Barrier

Photos documenting the condition and extent of the site cover will be provided as Attachment D.3 once the barrier is constructed.

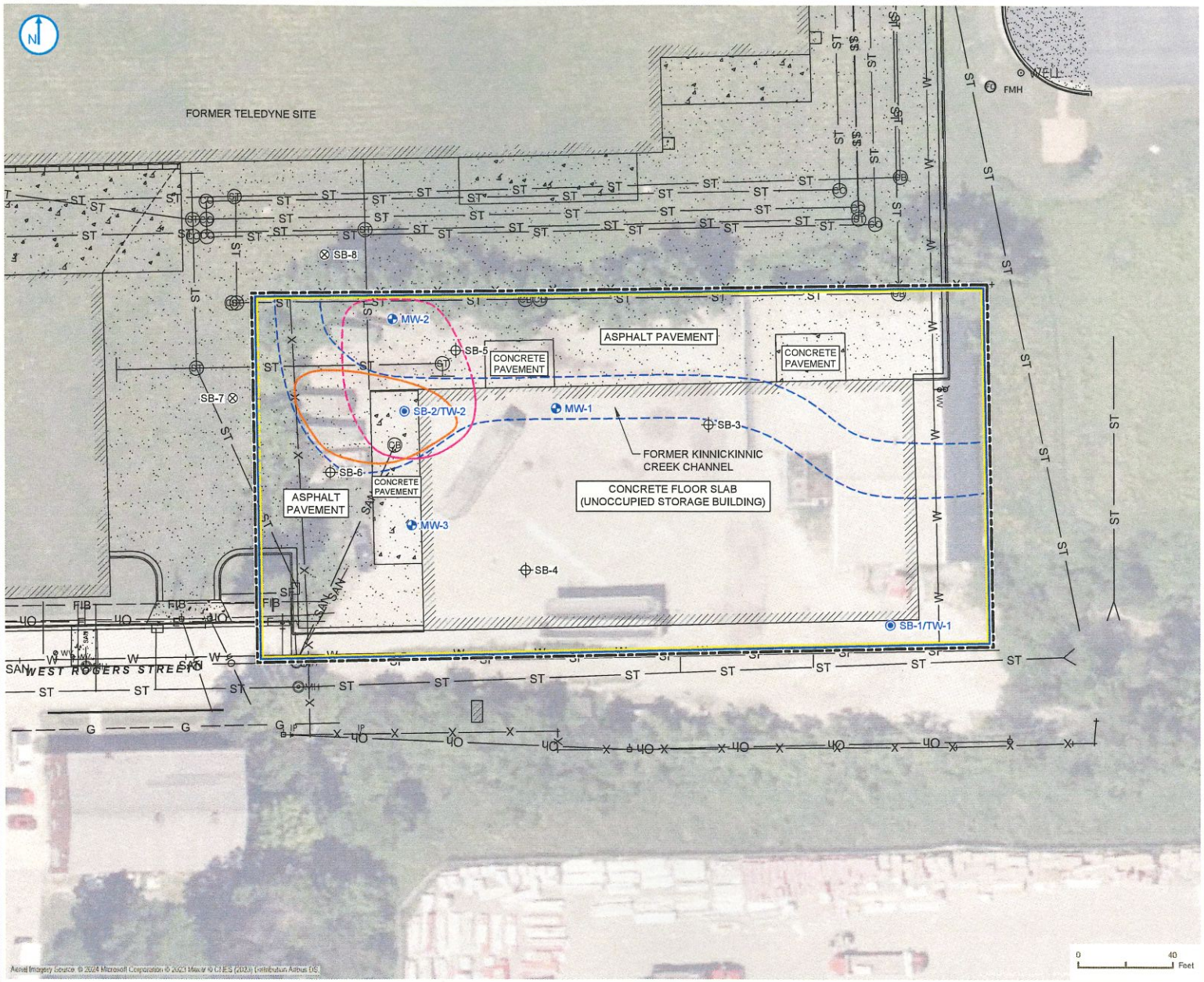
D.4 Continuing Obligations Inspection and Maintenance Log

WDNR Fillable Form 4400-305 will be used to document inspection and maintenance.

ATTACHMENT D

BARRIER MAINTENANCE PLAN

D.2 Location Maps



SITE BOUNDARY

LIMITS OF FORMER KINNICKINNIC CREEK CHANNEL (APPROXIMATE)

SOIL PROBE/SMALL DIAMETER MONITORING WELL

SOIL PROBE

2-INCH DIAMETER MONITORING WELL

OFF-SITE SOIL PROBE

EXTENT OF IDC RCL EXCEEDANCES - PCBs (High Risk) and VOCs

EXTENT OF IDC RCL EXCEEDANCES - Arsenic, Lead, PAHs

EXTENT OF ES EXCEEDANCES

EXTENT OF PROPOSED DIRECT CONTACT BARRIER

* DASHED CONTOURS ARE APPROXIMATE

PROPOSED DIRECT CONTACT BARRIER

CITY OF WEST ALLIS TRANSFER STATION
5032 WEST ROGERS STREET
WEST ALLIS, WISCONSIN

FIGURE D.2

RAMBOLL AMERICAS ENGINEERING SOLUTIONS, INC.
A RAMBOLL COMPANY

RAMBOLL

PROJECT: 1940106525 DATED: 10/29/2024 DESIGNER: HJWARD

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