September 5, 2025 Project Reference #14823

Mr. Adam McIlheran
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
1027 W. St. Paul Avenue
Milwaukee, WI 53233

RE: **Revised Cap Maintenance Plan**
Former Western Metal Specialty Division (The Reef)
1215 N. 62nd Street, Wauwatosa, WI
BRRTS #02-41-532149, 02-41-539928, 06-41-559856; FID # 241033540

Dear Mr. McIlheran:

On behalf of Tosa Reef, LLC (Tosa Reef), The Sigma Group, Inc. (Sigma) has revised the previously submitted Cap Maintenance Plan (CMP) for the above referenced property (the "Site"). The CMP was submitted as an Appendix to the *Soil Management & Engineered Barrier Report* dated September 18, 2024. The Department of Natural Resources (DNR) provided comments on the September 2024 CMP in electronic correspondence dated June 16, 2025.

A copy of the revised CMP, the Engineered Barriers Figure, and the inspection log is attached for additional DNR review and comment, if necessary.

Sincerely,

THE SIGMA GROUP, INC.

Stephen Meer, P.E.
Senior Engineer

Kristin Kurzka, P.E., P.G.
Vice President

Cc: Dave Scherzer, Sigma
Mark Lake, Tosa Reef, LLC

List of Attachments

Attachment A – Revised CMP, Figure D.2 and Inspection Log

ATTACHMENT A

Revised CMP, Figure D.2 and Inspection Log

CAP MAINTENANCE PLAN
BRRTS # 02-41-532149, 02-41-539928, 06-41-559856

Former Western Metals Specialty Division
(The Reef)
1215 N. 62nd Street
WAUWATOSA, WISCONSIN 53213

SEPTEMBER 2025

Property Located at:	1205 and 1225 N. 62nd Street, Wauwatosa, Wisconsin 53213
WDNR BRRTS	#02-41-532149, 02-41-539928, 06-41-559856
WDNR FID	#241033540
Parcel I.D.	384-0009-004 and 384-0009-005
Legal Descriptions:	Lot 1 and Lot 2 of CSM #8617 located in the City of Wauwatosa, Milwaukee County, Wisconsin.

Introduction

This document is the Cap Maintenance Plan (CMP) for the subject property in accordance with the requirements of s. NR 724.13(2), Wisconsin Administrative Code.

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

- The case file located at the WDNR Southeast Region office;
- BRRTS on the Web (DNR's internet-based database of contaminated sites); http://botw.dnr.state.wi.us/botw/SetUpBasicSearchForm.do; and
- WDNR Project Manager: Adam McIlheran
  Phone: (414) 207-2179
  Email: adam.mcilheran@wisconsin.gov.

Brief Descriptions

Soil impacted by select chlorinated volatile organic compounds (CVOCs) and/or select polynuclear aromatic hydrocarbons (PAHs) is located at depths generally varying between approximately 1 and 12 feet below ground surface (bgs) at locations across the Site.

Description of Engineered Barriers and Area to Maintain as Part of Cap Maintenance Plan:

Residual soil contamination across the site requires engineered barriers to effectively reduce human health risks from direct contact exposure and to limit precipitation infiltration into the subsurface. There are four engineered caps that require inspection and maintenance or repair if damaged: 1) building concrete floor slabs, 2) exterior concrete pavement and sidewalks, 3) asphalt pavement, and 4) soil/landscaped areas. The four caps are described in further detail below:

- Building Concrete Floor Slabs - The building floor slabs were constructed with a minimum of 4 inches of concrete.
- Concrete Sidewalks - The concrete pavements and sidewalks are a minimum of 5 inches thick.
- Asphalt Pavement - Asphalt pavement is 3.5 to 4 inches thick to meet industry standards.
- Exempt Soil / Topsoil - Landscaped areas (including areas with vegetation or other non-pavement material designed to prevent erosion) were constructed with a minimum thickness of 12 inches of imported topsoil over a black geotextile fabric warning layer over an additional minimum 12 inches of low permeability soil.

- Biofiltration Basin – The biofiltration basin located within the eastern portion of the Site south of the 1205 W. State Street building was constructed with a 30-mil thick geosynthetic liner overlain by a nine-inch thick layer of gravel, a layer of filter fabric, a three-foot thick layer of engineered soil and surficial vegetative plantings.

The engineered caps over the impacted soils serve as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health and serve to limit precipitation infiltration from continuing to leach impacts to shallow groundwater. Based on the current and future use of the property, the barriers should function as intended unless disturbed. The extents of the engineered barriers are depicted on **Figure D.2.**

Planting Within Landscaped Areas

In areas where planting of trees or shrubs (during initial redevelopment of the Site or in the future) requires excavation of material below the warning layer, the owner will inform maintenance workers of the potential direct contact exposure hazard. The soil generated from beneath the warning layer must be treated, stored, and disposed of by the owner in accordance with applicable local, state, and federal law.

Annual Inspection

The engineered caps overlying the impacted soil will be inspected once a year, normally in the spring after all snow and ice is gone, 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 1**, Continuing Obligations Inspection and Maintenance 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 at the address of the property owner (listed below) and available for submittal or inspection by Wisconsin Department of Natural Resources ("WDNR") representatives upon their request.

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. 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 caps overlying the impacted soil at the site are removed or replaced, the replacement barrier must be equally as effective. 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 caps, will maintain a copy of this CMP on-site and make it available to all interested parties (i.e. on-site employees, contractors, 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 a site cap 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 a cover, or a building which is acting as a cover, are considered, the property owner will contact DNR 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 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

September 2025

Owner:

Tosa Reef, LLC.
1200 N. Mayfair Road, Suite 410
Milwaukee, WI 53226
Contact: Mr. Mark Lake
Telephone: 414-777-1200
Email: mlake@wangard.com

Environmental Consultant:

The Sigma Group, Inc.
1300 W. Canal Street
Milwaukee, WI 53233
Contact: Mr. Stephen Meer, P.E.
Phone: 414-643-4200
Email: smeer@thesigmagroup.com

Wisconsin Department of Natural Resources Project Manager:

Wisconsin Department of Natural Resources
Remediation & Redevelopment Program
1027 W. St. Paul Avenue
Milwaukee, WI 53233
Contact: Mr. Adam McIlheran
Phone: 414-207-2179
Email: adam.mchilheran@wisconsin.gov

THE SIGMA GROUP
Single Source. Sound Solutions.

ENGINEERED BARRIERS MAP

THE REEF
1205 & 1215 N 62ND ST
WAUWATOSA, WI

FIGURE
D.2

PROJECT: 14823 | FILE FOLDER: 060 CAD - 200_Env | FILENAME: 14823_Engineered Barriers Map.ai | CREATED BY: CRD | DATE: 09/10/2024 | MODIFIED BY: XXX | DATE: XX/XX/XXXX

FILE PATH: I:\Wangard Partners\14823 - The Reef remediation\060 CAD\09.2024 cap base map

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

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (R 7/20)

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 Public 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.
The Reef	06-41-559856

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):

jennifer.meyer1@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?
09/29/2022	Joe Kaszubowski	[ ] monitoring well [x] cover/barrier for soil [ ] sediment cap [ ] other:	Paved surfaces (asphalt and concrete)	None	( ) Y ( ) N	(●) Y ( ) N
09/29/2022	Joe Kaszubowski	[ ] monitoring well [x] cover/barrier for soil [ ] sediment cap [ ] other:	Landscaped areas	None	( ) Y ( ) N	(●) Y ( ) N
07/17/2023	Carley DeLong	[ ] monitoring well [x] cover/barrier for soil [ ] sediment cap [ ] other:	Paved surfaces (asphalt and concrete)	None	( ) Y ( ) N	(●) Y ( ) N
07/17/2023	Carley DeLong	[ ] monitoring well [x] cover/barrier for soil [ ] sediment cap [ ] other:	Landscaped areas	Pipe/conduit visible in landscaped area - recommend checking on / repairing as needed (in greenspace area on N 62nd street)	(●) Y ( ) N	(●) Y ( ) N
05/23/2024	Carley DeLong	[ ] monitoring well [x] cover/barrier for soil [ ] sediment cap [ ] other:	Paved surfaces (asphalt and concrete)	None	( ) Y ( ) N	(●) Y ( ) N
05/23/2024	Carley DeLong	[ ] monitoring well [x] cover/barrier for soil [ ] sediment cap [ ] other:	Landscaped areas	Pipe/conduit visible in landscaped area - recommend checking on / repairing as needed (in greenspace area on N 62nd street) - not a cap breach	(●) Y ( ) N	(●) Y ( ) N

06-41-559856 | The Reef
BRRTS No. | Activity (Site) Name

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (R 7/20)

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?
06/05/2025	Carley DeLong	☐ monitoring well ☒ cover/barrier for soil ☐ sediment cap ☐ other:	Paved surfaces (asphalt and concrete)	None	◉ Y ○ N	◉ Y ○ N
06/05/2025	Carley DeLong	☐ monitoring well ☒ cover/barrier for soil ☐ sediment cap ☐ other:	Landscaped areas	Missing grass and topsoil visible where the sidewalks meet the grass, present across the entire site. Recommend patching spots or additional landscaping measures to prevent major erosion	◉ Y ○ N	◉ Y ○ N

{Click to Add/Edit Image} Date added: 06/05/2025

Title: asphalt pavement in SW area of site, looking east

{Click to Add/Edit Image} Date added: 06/05/2025

Title: pavement and landscape area, north central area of site

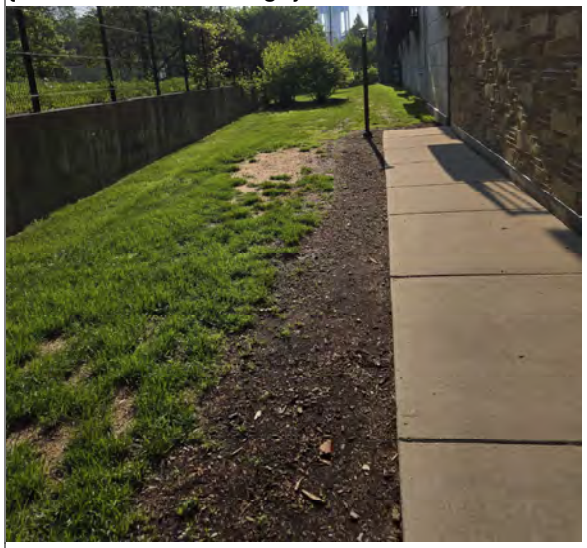
{Click to Add/Edit Image} Date added: 06/05/2025

Title: paved area, west of clubhouse, looking south

{Click to Add/Edit Image} Date added: 06/05/2025

Title: landscaping, north area of site looking west

{Click to Add/Edit Image} Date added: 06/05/2025

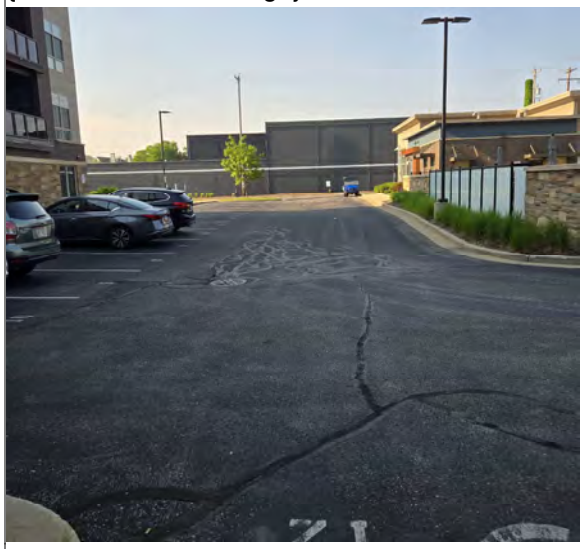


Title: landscaping on north side looking east

{Click to Add/Edit Image} Date added: 06/05/2025

Title: concrete sidewalk between buildings facing north

{Click to Add/Edit Image} Date added: 06/05/2025



Title: asphalt pavement near Clubhouse, facing south

{Click to Add/Edit Image} Date added: 06/05/2025

Title: asphalt pavement in southeast area of site, looking west

{Click to Add/Edit Image} Date added: 06/05/2025

Title: visible piping/conduit, N 62nd Street, east side of site

{Click to Add/Edit Image} Date added: 06/05/2025

Title: visible topsoil/warning layer, southeast side area of site, looking east