Amadi, Eric A - DNR

From: Yang, Chue Yee - DNR
Sent: Thursday, March 22, 2018 1:01 PM
To: Amadi, Eric A - DNR
Subject: FW: BRRTS No. 02-41-580143 Area B West Lot 1 Case Closure - GIS Registry

Hi Eric,

See link below for the E-copy.

R:_SER_E_FILES\Milwaukee_41\0241580143_LIGHT_COMMERCIAL-AREA_B_WEST_LOT_1_CLOSURE_PACKET\20170918_Revisions\20180322

Thanks,

Chue

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Chue Yee Yang
Phone: (414) 263-8366
Chueyee.Yang@wisconsin.gov

From: Kelly Otis [mailto:kotis@ramboll.com]
Sent: Thursday, March 22, 2018 10:08 AM
To: DNR RR SER <DNRRRSER@wisconsin.gov>
Cc: Amadi, Eric A - DNR <Eric.Amadi@wisconsin.gov>
Subject: BRRTS No. 02-41-580143 Area B West Lot 1 Case Closure - GIS Registry

A zip folder named BRRTS No. 02-41-580143_Area B West Lot 1.zip was uploaded to the WDNR ftp site today. A paper copy was previously sent to the WDNR Project Manager and fees were previously submitted.

Yours sincerely
Kelly Otis

Administrative Assistant

D 262.901.0094
kotis@ramboll.com

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Brookfield, WI 53045
USA
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rcvd 3/22/2018

D.1 Descriptions of maintenance action(s) required for maximizing effectiveness of the engineered control, vapor mitigation system, or other action for which maintenance is required

COVER or BARRIER MAINTENANCE PLAN

November 27, 2017

Property Located at:

160 W Town Square Way (fka 7929 South Howell Avenue)
Oak Creek, Wisconsin

BRRTS No. 02-41-580143
FID # 241045750 — revised and accepted FID#: 241045750
NE ¼ of the NE ¼ of Sec 17, T05N, R22E
Parcel ID No. 81-39-046000

Introduction

This document is the Maintenance Plan for an integrated soil barrier consisting of a building, asphalt parking and elevated landscaped areas at the above-referenced property in accordance with the requirements of s. NR 724.13 (2), Wis. Adm. Code. The maintenance activities relate to the integrated soil barrier consisting of a building, asphalt parking and elevated landscaped areas which limit direct contact to soil that is impacted with low levels of polynuclear aromatic hydrocarbon (PAH) compounds that remains on site. A direct contact cover has been determined to provide and an effective remedy that protects human health and the environment on this site.

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

- The case file in the DNR Southeast 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.

D.1. Descriptions:

Description of Contamination

Soils within four feet of the ground surface contain concentrations of polynuclear aromatic hydrocarbons (PAHs) above current direct contact standards for non-industrial soils. Based upon the soil data from the Phase II/III investigations, there is one location in Area B- North where elevated PAHs were quantified. Groundwater contaminated by arsenic is located at a depth of 7.7 to 11.3 feet below ground surface (bgs). The extent of soil contamination is shown on the attached Figure D.2.

Description of the Barrier to be Maintained

The integrated soil barrier on the property consists of a building, asphalt parking and elevated landscaped areas of varying thickness. The building is slab on grade construction with concrete foundations and building slabs constructed over layers of compacted underlying clay soils, a base course layer followed by a concrete layer. The building foundation slabs are generally 6 - 8 inches thick and are underlain by 12 inches of crushed

gravel. Depending upon the locations within the building, there may also be internal floor finishes consisting of tiles, wood or laminate materials. The asphalt parking areas consist of compacted soil, overlain by a base course layer and then at least two layers of asphalt for an asphalt thickness of 6 inches or more. The landscaped areas consist of at least 6 inches of bedding soil planted with various small shrubs or flowers interspersed with mulch or stone coverings. These surface coverings will prevent direct contact with residual soil contamination. The integrated soil barrier covers the residual soil contamination in the southern portion of the site, as shown on the attached Figure D.2.

Cover/Building/Slab/Barrier Purpose

The integrated soil barrier consisting of a building, asphalt parking and elevated landscaped areas overlying the contaminated soil serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. Based on the current use of the property, commercial, the direct contact barrier layer should function as intended unless intentionally disturbed.

Annual Inspection

The integrated soil barrier consisting of A building, asphalt parking and elevated landscaped areas overlying the contaminated soil and as depicted in Figure D.2 will be inspected once a year, normally in the spring after all snow and ice is gone, for deterioration, cracks and other potential problems that can cause exposure to underlying soils or pavement in outside areas. 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 the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to become exposed will be documented. Similarly, areas where the pavement or building slabs are cracked, show evidence of settlement or have deteriorated due to age or use will be noted for follow-up action. These follow-up actions could include supplemental soil placement in areas of erosion followed by replacement of plantings, mulch or stone; repair of pavement or building slab subsidence; filling of pervasive large cracks with appropriate types of crack sealers which are weather resistant as needed or even patching of slabs or pavement when necessary. (See Maintenance Activities paragraph, below)

A log of the inspections and any repairs will be maintained by the property owner and is included as 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. Once repairs are completed, they will be documented in the inspection log. A copy of the maintenance plan and inspection log will be kept at the site; or, if there is no acceptable place (for example, no building is present) to keep it at the site, at the address of the property owner and available for submittal or inspection by Wisconsin Department of Natural Resources (DNR) 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. Repairs can include patching and filling or larger resurfacing or at times, 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 that any part of the integrated soil barrier consisting of buildings, asphalt parking and landscaped areas overlying the contaminated soil is removed or replaced, the replacement barrier must be equally

protective against direct contact. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or its successor.

The property owner, in order to maintain the integrity of the integrated soil barrier consisting of a building, asphalt parking and elevated landscaped areas, will maintain a copy of this Maintenance Plan at the site; or, if there is no acceptable place to keep it at the site (for example, no building is present), at the address of the property owner 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 a Cover/Barrier

The following activities are prohibited on any portion of the property where the soil barrier is required as shown on the attached map, 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; 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 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 Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of DNR.

Contact Information

November 2017

Site Owner and Operator: Erica-Nicole Harris
WISPARK, LLC
231 West Michigan Street, ~~Suite~~ P423, Milwaukee, WI 53203
(414) 221-5501

Signature:

Property Owner: Andrew Goodman, Co-Manager, GMX Real Estate Group, LLC as Development Agent
GMX Midland Oak Creek, LLC
3000 Dundee Road Suite 408, Northbrook, IL 60062
(847) 680-8600 ext. 302

Signature:

Consultant: Ramboll Environ US Corporation
175 N. Corporate Drive, Suite 160, Brookfield, WI 53045
(262) 901-0094

DNR: Mr. Eric Amadi, Hydrogeologist
2300 N. Martin Luther King, Jr. Dr., Milwaukee, WI
(414) 263-8500