



April 14, 2022

Mr. John Gackstetter
Hendricks Commercial Properties
525 Third Street, Suite 300
Beloit WI 53511

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Addendum to the May 29, 2007 Closure Letter
MGP WP&L Coal Gas Site, with a former address of 111 Shirland Avenue, Beloit, WI
Current address of 217 Shirland Avenue, Beloit, WI
DNR BRRTS Activity #: 02-54-001302
Property Parcel Numbers 135-40073 and 135-40080

Dear Mr. Gackstetter:

On May 29, 2007, the Department of Natural Resources (DNR) issued a case closure letter with continuing obligations for the site identified above (Site). The continuing obligations address potential exposure to petroleum volatile organic compounds (PVOCs) and polynuclear aromatic hydrocarbons (PAHs) that remain in soil and groundwater. Changes to the requirements of the case closure letter are identified in this addendum, in the Revised Conditions of Closure section, and are issued under Wis. Stat. § 292.12 and Wis. Admin. Code chs. NR 725, 726 and 727, NR 140, and NR 141. Other continuing obligations included in the case closure letter remain in effect. The DNR received a request to modify the continuing obligation requirements at the Site in a request received on May 3, 2020. The DNR issued a notice to proceed on May 26, 2020. Documentation of the work completed at the Site and a new cap maintenance plan were received by the DNR on March 8, 2022. This addendum is the approval of following completion and documentation of actions taken. Fees for this response were prepaid on June 18, 2020.

The former MGP W P & L Coal Gas site was located at 111 Shirland Avenue. Construction and redevelopment of the site to the Riverbend Stadium (also known as ABC Supply Stadium) and associated parking occurred in 2020 and 2021. The Riverbend Stadium has a new address of 217 Shirland Avenue, Beloit, WI. The March 8, 2022 Construction Completion Summary Report documents the activities conducted at the Site were in accordance with the May 3, 2020 Request for Preliminary Decision on Post Closure Modification for the Riverbend Stadium and with the May 29, 2007 MGP W P & L Coal Gas site closure requirements.

The topsoil throughout the site was assumed to be the engineered barrier placed as part of the environmental repair program (ERP) May 29, 2007 site closure. Soil screening and the laboratory analytical test results of the topsoil stripped from the site was considered "clean" for the purpose of disposal. A total of 107 loads of concrete and 935 loads (approximately 11,220 cubic yards) of topsoil were disposed of at a fill site in South Beloit, IL. Contaminated soils generated from the rough grading,

installation of underground utilities, and excavation of footings totaling 16,068.49 tons were hauled and disposed of at Advanced Disposal's Mallard Ridge Landfill in Delavan, WI.

The Site owner is the City of Beloit. The current lease holder for the Site is the Riverbend Stadium Authority, located at 525 Third Street, Suite 300, Beloit, WI 53511.

Revised Conditions of Closure

Cover (for soil) (Wis. Stat. § 292.12(2)(a), Wis. Admin. Code §§ NR 724.13(1) and (2), NR 726.15(2)(d) and/or (e), NR 727.07(1))

The cover consists of the buildings and permanent structures, sidewalks and paved surfaces for driving and parking, the green spaces that includes 3 feet of clean imported topsoil from Darien, WI, and the Synthetic Turf Athletic Playing Surface. The cover is shown on the enclosed map (Cap Maintenance Plan, 4/6/2022) and shall be maintained in compliance with the enclosed maintenance plan, dated March 7, 2022. The purpose of the cover is to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health.

You and any future property owners must adhere to the requirements in this closure letter addendum, as well as any applicable continuing obligations applied to this property as identified in the May 29, 2007 case closure letter.

This closure addendum letter and information submitted with the post-closure modification request will be included in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) to provide public notice of residual contamination and continuing obligations. Find BOTW at dnr.wi.gov, search "BOTW." An online map view of the site can also be found on the RR Sites Map (RRSM) at dnr.wi.gov, search "RRSM."

Thank you for your efforts to protect Wisconsin's environment. If you have any questions regarding this letter, please contact the DNR Project Manager, Janet DiMaggio, at (608) 219-2155 or janet.dimaggio@wisconsin.gov.

Sincerely,



Issac A. Ross
Team Supervisor, South Central Region
Remediation and Redevelopment Program

Attachments:

Case closure letter dated May 29, 2007
Updated Cap Maintenance and Soil Management Plan dated March 7, 2022
Aerial Photo Site Location Map
Cap Maintenance Plan Map, 4/6/2022
Continuing Obligations Inspection and Maintenance Log

cc: Lori S. Curtis Luther, City Manager, City of Beloit, 100 State Street, Beloit, WI 53511
Riverbend Stadium Authority, 525 Third Street, Suite 300, Beloit, WI 53511
Bradley A. Brown, Brownfield Environmental Engineering



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
Lloyd L. Eagan, Regional Director

South Central Region Headquarters
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711-5397
Telephone 608-275-3266
FAX 608-275-3338
TTY Access via relay - 711

May 29, 2007

Mr. Dave Botts
City of Beloit
100 State Street
Beloit, WI 52511

**SUBJECT: Final Case Closure with Land Use Limitations or Conditions
WP&L Coal Gas Site, 11 Shirland Avenue, Beloit, WI
WDNR BRRTS Activity #: 02-54-001302**

Dear Mr. Botts:

On January 8, 2007, the South Central Region Closure Committee reviewed the above referenced case for closure. This committee reviews environmental remediation cases for compliance with state laws and standards to maintain consistency in the closure of these cases. On January 12, 2007, you were notified that the Closure Committee had granted conditional closure to this case.

On May 22, 2007 the Department received correspondence indicating that you have complied with the requirements of closure. Abandonment forms for the monitoring wells at the site were received on this date.

Based on the correspondence and data provided, it appears that your case meets the requirements of ch. NR 726, Wisconsin Administrative Code. The Department considers this case closed and no further investigation or remediation is required at this time.

Please be aware that pursuant to s. 292.12 Wisconsin Statutes, compliance with the requirements of this letter is a responsibility to which you and any subsequent property owners must adhere. If these requirements are not followed or if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, welfare, or the environment, the Department may take enforcement action under s. 292.11 Wisconsin Statutes to ensure compliance with the specified requirements, limitations or other conditions related to the property or this case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code. It is the Department's intent to conduct inspections in the future to ensure that the conditions included in this letter including compliance with referenced maintenance plans are met.

Pursuant to s. 292.12(2)(a), Wis. Stats., the soil cover that currently exists in the location shown on the attached map shall be maintained in compliance with the attached maintenance plan in order to prevent direct contact with residual soil contamination that might otherwise pose a threat to human health. If soil in the specific locations described above is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil to determine if residual contamination remains. If sampling confirms that contamination is

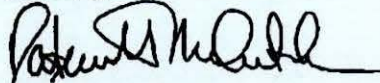


present the property owner at the time of excavation will need to determine whether the material would be considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable statutes and rules. In addition, all current and future owners and occupants of the property need to be aware that excavation of the contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken during excavation activities to prevent a health threat to humans.

Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the GIS Registry. To review the sites on the GIS Registry web page, visit <http://dnr.wi.gov/org/aw/rr/gis/index.htm>. If your property is listed on the GIS Registry because of remaining contamination and you intend to construct or reconstruct a well, you will need prior Department approval in accordance with s. NR 812.09(4)(w), Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line <http://www.dnr.state.wi.us/org/water/dwg/3300254.pdf> or at the web address listed above for the GIS Registry.

The Department appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Randy Maass at (608) 275-3224.

Sincerely,



Patrick McCutcheon
South Central Region Remediation & Redevelopment Team Supervisor

cc: Dawn Gabardi, Arcadis Inc., 126 N. Jefferson Street, Suite 400, Milwaukee, WI 53202
Wendy Weihemuller, DNR

March 7, 2022

WI Department of Natural Resources
South Central Region Remediation & Re-Development
Attn: Janet DiMaggio, Hydrogeologist
3911 Fish Hatchery Road
Fitchburg, WI 53711

RE: Updated Cap Maintenance and Soil Management Plan
Riverbend Stadium, 217 Shirland Avenue, Beloit, WI 53511
BRRTS: 02-54-001302

Dear Ms. DiMaggio,

Brownfield Environmental Engineering Resources, LLC (Brownfield) has prepared this Updated Cap Maintenance and Soil Management Plan on behalf of the Riverbend Stadium Authority for the Riverbend Stadium located at 217 Shirland Avenue, Beloit, WI (the Site). The Updated Cap Maintenance and Soil Management Plan has been updated from the Arcadis, Inc. Cap Maintenance and Soil Management Plan that was included in the continuing obligations package for the Site. This document serves as the updated version of the Cap Maintenance and Soil Management Plan for the newly constructed Riverbend Stadium, also known as ABC Supply Stadium, located at 217 Shirland Avenue, Beloit, Wisconsin. The original Cap Maintenance and Soil Management Plan was prepared by Arcadis, Inc. as a part of the Final Case Closure for 111 Shirland Avenue, Beloit, WI (also known as 217 Shirland Avenue, Beloit, WI, formerly known as the WP&L Coal Gas Site).

This Updated Cap Maintenance and Soil Management Plan provides a summary of Brownfield's Phase II Environmental Site Assessment (ESA) investigation and remediation activities completed at the Site and a description of the procedures to be followed for the inspection and maintenance of the Engineered Barriers. A description of the procedures for modifying, repairing, or penetrating the Engineered Barriers is also included, with procedures for managing any residual impacted soil encountered during such activities.

The purpose of the updated Cap Maintenance Plan is to describe the procedures and controls that must be followed to maintain the function of the Engineered Barriers that are currently present on the Site. The Engineered Barriers should limit the direct contact exposure to the petroleum volatile organic compounds (PVOCs) and polyaromatic hydrocarbons (PAHs) in the soil as stated in the Arcadis, Inc. plan. Limited Phase II ESA investigation activities conducted on February 25th and 26th of 2020 by Brownfield identified volatile organic compounds (VOCs) that exceeded the Wisconsin Department of Natural Resources (WDNR) groundwater quality preventative action levels (PALs) in groundwater samples. Soil analytical results indicated that VOCs, PAHs, and metals exceeded WDNR residual contamination levels (RCLs). The Engineered Barriers on the Site include the following: the stadium buildings and permanent structures, sidewalks and paved surfaces for driving and parking,

green spaces and pervious areas with three (3) feet of clean fill/soil, and Synthetic Turf Athletic playing surface. An aerial photo depicting the locations of the Engineered Barriers is included as **Attachment 1**.

The purpose of the updated Soil Management Plan is to provide a procedure to characterize and manage soils excavated from the Site. Based upon previous and present soil investigations performed on the Site, significant contamination was found to be present throughout. Soils generated during excavation activities shall either be managed on-site or disposed off-site at a landfill. Based upon soil analytical data from the Brownfield Limited Phase II ESA, soil requiring disposal off-site is classified as non-hazardous based upon the Code of Federal Regulations, Chapter I, Subchapter I, Part 261, Subpart C, Part 261, Identification and Listing of Hazardous Waste.

The Brownfield Limited Phase II ESA investigation on February 25-26th, 2020 documented significant soil contamination at the Site. Exceedances of the NR 720 Direct Contact Industrial RCLs are documented in **Attachment 2**. "Direct contact," as defined by NR 720.03 (4) means, "human exposure to substances in soil through one or more of the following pathways: inhalation of particulate matter, dermal absorption, incidental ingestion, or inhalation of vapors from the soil." It is recommended that Engineering Controls and Institutional Control measures such as dust control and air monitoring with field instruments be implemented to manage any potential environmental risk of exposure potential to the Site workers, if Site development, repairs, or maintenance activities occur. A Site-Specific Health and Safety Plan should be implemented to protect workers from being exposed to hazardous substances that are known to be present at the Site.

A copy of this Updated Cap Maintenance and Soil Management Plan shall at all times be kept on file in the offices of: (1) the WDNR Southern Region; (2) the owner of the Site, its successors and assigns (hereinafter identified collectively as the "Owner"); and (3) the Site manager, if any. The Updated Cap Maintenance and Soil Management Plan shall be made available by the Owner to contractors, utilities and maintenance personnel, and any other public or private persons or entities authorized to perform work at the Site. The WDNR and its successor and assigns shall be notified of any activity which is not in accordance with this Updated Cap Maintenance and Soil Management Plan.

Overview of Site Conditions

The Site is located north of Shirland Avenue and approximately 750 feet west of US Route 2 in Beloit, Wisconsin. The Rock River runs adjacent to the west of the Site. The Site is bordered by the Rock River to the north and west, the Illinois-Wisconsin State line and Turtle Creek to the South, and mixed commercial lots and the Beloit Transfer Facility to the east. The Site consists of two parcels, which encompasses approximately 8 acres of land identified by parcel numbers 13540080 and 13540073.

Based on the Phase I ESA completed by Brownfield in 2020, the Site was originally developed in 1884 and was occupied by the Beloit Water, Gas & Electric Co., Standard Oil Co., and a railroad stockyard on the Site. Sanborn maps show the presence of a manufactured gas plant (MGP) operated by the Wisconsin Power & Light Co. from 1902 until 1948. The City of Beloit purchased the Site in two

phases (1956 and 1966) and constructed a wastewater treatment plant on the Site which operated until 1991. The wastewater treatment plant was eventually demolished in 1999, and the Site was redeveloped with green space, a roadway, and a riverfront park path. The Site was vacant and undeveloped from 1999 to 2020. The Site is currently developed as a minor-league baseball stadium known as ABC Supply Stadium.

According to the Arcadis, Inc. Cap Maintenance and Soil Management Plan, investigation activities initiated in the 1990s identified constituents in the soil and groundwater that were associated with historical operations and releases from the MGP. The detected constituents of interest included PVOCs and PAHs. A limited area of tar-affected soil was observed in the southern portion of the Site, following demolition of the buildings. With the exception of this area, the investigation did not identify discrete source areas. Rather, constituent concentrations are widely distributed across the Site and were diffusible in nature. Due to the diffusible nature of the identified constituents, Arcadis, Inc. developed a sitewide approach for remediation such as the use of natural attenuation to remediate dissolved-phase hydrocarbons in the groundwater, reducing direct contact exposure by utilizing Engineered Barriers, and targeted excavation and off-site disposal of tar-affected soil.

During the Brownfield Limited Phase II ESA, a total of twenty-one (21) soil borings were advanced at the Site. The soil borings were advanced at strategic and accessible locations on the Site to depths ranging between 10 to 24 feet below ground surface (bgs), dependent on localized geologic conditions. During the investigation, six (6) soil borings were converted to temporary groundwater monitoring wells for the collection of representative groundwater samples. The temporary groundwater monitoring well locations were selected based on the subsurface conditions encountered during drilling, as well as proximity to the proposed underground utility work to be installed at the Site. The collected soil samples were analyzed for VOCs, PAHs, and Resource Conservation and Recovery Act (RCRA) metals. Groundwater samples were analyzed for VOCs. The above listed analyses represent indicator contaminants generally associated with the Site's historical use. Soil and groundwater analytical results were compared to Wisconsin Administrative Code Chapter NR 720 Soil Cleanup Standards and NR 140 Preventive Action Limits (PAL) and Enforcement Standards (ES), which were developed to establish minimum standards for the remediation of soil and groundwater contamination. Significant soil contamination was found to be present throughout the Site. Soil sample results are presented in a soil summary comparison table in **Attachment 3**. Groundwater analytical results from this investigation indicated that concentrations of VOCs were detected above the WI NR 140 PAL. The groundwater summary comparison table of the laboratory analytical data to WI NR 140 PAL and ES can be found in **Attachment 4**.

The redevelopment of the Site from an open green space to the ABC Supply Stadium commenced in July of 2020. The construction of the ABC Supply Stadium at the Site required site-wide redevelopment and soil disturbance. The clean soil Engineered Barrier that was placed in 2006 was stripped from the Site and properly disposed of at a clean fill site in Illinois. The previous Engineered Barrier topsoil was sampled by Brownfield to determine the level of contamination, if any, on July 16, 2020, prior to the hauling of soil off-site. The soils that were generated from rough grading,

installation of underground utilities, and excavation of footings were hauled and disposed of at Advanced Disposal's Mallard Ridge Landfill (now known as GFL Environmental's Mallard Ridge) in Delavan, WI. The Site currently consists of the stadium buildings and permanent structures, sidewalks and paved surfaces for driving and parking, green spaces and pervious areas with three (3) feet of clean fill/soil, and Synthetic Turf Athletic playing surface in place as the Engineered Barriers.

Required Activities:

Annual Inspections

The Engineered Barriers located throughout the Site shall be inspected at least annually by the Owner to ensure that the integrity of the Engineered Barriers are maintained and that no significant fissures, cracks or erosional features develop in the Engineered Barriers, which would allow uncontrolled contact with the underlying soil. Any disturbances of the Engineered Barriers or significant fissures, cracks or erosional features in the Engineered Barriers shall be noted. The Continuing Obligations Inspection and Maintenance Log (WDNR Form 4400-305) shall be utilized while observing the Engineered Barriers and is attached to this Updated Cap Maintenance and Soil Management Plan as **Attachment 5**. Upon completion of the inspection by the Owner, a brief report shall be prepared which identifies the date of the inspection, the individuals conducting the inspection, and any observed disturbances of the Engineered Barriers including any significant fissures, cracks or erosional features in the Engineered Barrier. A copy of the inspection report shall be maintained on file by the Owner and/or the Site manager.

Repairs to Engineered Barrier(s)

If during the annual inspection or other routine inspection the Engineered Barriers are observed to have been disturbed or significant fissures, cracks or erosional features are observed in the Engineered Barriers, the Owner shall arrange to have repairs made to such areas in a manner consistent with this Updated Cap Maintenance and Soil Management Plan. Such repairs shall be carried out within a reasonable period of time not to exceed one hundred twenty (120) days, subject to weather and seasonal considerations.

Allowed Activities:

The following allowed activities must comply with all listed requirements.

1. **Landscaping Maintenance.** Landscaping features may intrude through site-wide soil cap or other Engineered Barrier types. In the event the Owner desires to install trees, shrubs, fencing or retaining walls, or perform other landscaping, the following steps shall be taken:
 - a. The contractor performing the work shall be provided with a copy of this Updated Cap Maintenance and Soil Management Plan by the Owner and shall prepare a health and safety plan, appropriate for the work being performed.
 - b. Any impacted soils which are excavated shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work. Any such excavation of impacted soils shall be conducted in accordance with the health

and safety plan. All excavated impacted soils shall be, at a minimum, placed onto plastic sheeting and covered, or placed into a water-tight container such as a covered roll-off box.

- c. Upon completion of the work, previously excavated impacted soils may be backfilled. Any previously excavated impacted soils which are not backfilled or otherwise made a part of the cap shall be properly characterized and managed in accordance with state law with notice to the WDNR.
- d. A memorandum or report shall be prepared describing the work performed, identifying the person(s) performing the work, the date of the work, and confirming that the Updated Cap Maintenance and Soil Management Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Owner and the Site manager, if any, and shall be made available for inspection by the WDNR, upon reasonable notice, during the normal business hours.

2. **Construction or Installation of Buildings, Structures or Other Improvements.** Buildings, structures, or other improvements may be constructed or installed in the areas included in this Updated Cap Maintenance and Soil Management Plan using footings or other foundations which are placed into the impacted soils in the following manner:

- a. The contractor performing the work shall be provided with a copy of this Updated Cap Maintenance and Soil Management Plan by the Owner and shall prepare a health and safety plan, appropriate to the work being performed.
- b. All materials used in pavement or foundation shall not contain any hazardous substances. Any impacted soils which are excavated shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work. Any such excavation of impacted soils shall be conducted in accordance with the health and safety plan. All excavated impacted soils shall be, at a minimum, placed onto plastic sheeting and covered, or placed into a water-tight container such as a covered roll-off box.
- c. Upon completion of the work, previously excavated impacted soils may be backfilled. Any previously excavated impacted soils which are not backfilled or otherwise made a part of the cap shall be properly characterized and managed in accordance with state law with notice to the WDNR.
- d. A memorandum or report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Updated Cap Maintenance and Soil Management Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Owner and the Site manager, if any, and shall be filed with the WDNR.

3. **Replacement and Repair of Engineered Barriers.** If it becomes necessary or desirable to replace or repair the Engineered Barriers, the repair or replacement shall be undertaken in the following manner:

- a. The contractor performing the work shall be provided with a copy of this Updated Cap Maintenance and Soil Management Plan by the Owner and shall prepare a health and safety plan, appropriate to the work being performed.
 - b. Any impacted soils which are excavated from beneath the Engineered Barriers shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work. Any such excavation of impacted soils shall be conducted in accordance with the health and safety plan, and all such excavated impacted soils shall be segregated and kept on site until completion of the work.
 - c. Upon completion of the work, previously excavated impacted soils may be placed back into the excavation. The area of the excavation shall be restored in a manner consistent with the original cap condition. Any previously excavated impacted soils which are not placed back in the excavation, or which is not otherwise made a part of the cap shall be properly characterized and managed in accordance with state law with notice to the WDNR.
 - d. A memorandum report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Updated Cap Maintenance Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Owner and the Site manager (if any) and shall be filed with the WDNR.
4. **Utility Installations or Repairs.** No utility repairs or installation of new or replacement utilities shall be conducted in the areas included in this Updated Cap Maintenance and Soil Management Plan until after the utility and any contractor(s) for the utility have acknowledged receipt of a copy of this Updated Cap Maintenance and Soil Management Plan. The utility repairs or installation(s) shall be conducted in strict conformance with the standards set forth below with respect to excavations into and/or beneath the Engineered Barriers, such excavations are to be undertaken in the following manner:
- a. The contractor performing the work shall be provided with a copy of this Updated Cap Maintenance and Soil Management Plan by the Owner and shall prepare a health and safety plan, appropriate to the work being performed.
 - b. Any impacted soils which are excavated or clean fill above the impacted soils which are excavated, all for purposes of utility installation or repair, shall be separated and segregated to the extent practicable so that they may be replaced upon completion of the work.
 - c. Upon completion of such work, the impacted soils may be placed back into the excavation. Similarly, the clean fill above the impacted soils may be placed back into the excavation to bring the excavation back to grade. The area of the excavation shall be restored in a manner consistent with the original cap condition.
 - d. Any excavation of soils beneath the impacted soils shall be conducted in accordance with the health and safety plan. Any such soils excavated from beneath the impacted soils shall be segregated, properly characterized and managed in accordance with state law with notice to the WDNR. Any other soils which have

been commingled, mixed or otherwise have come into contact with soils excavated from beneath impacted soils shall be properly characterized and managed in accordance with state law with notice to the WDNR. Provided, further, that any groundwater affected by such activities shall be managed in accordance with state law after notice to the WDNR.

- e. Clean fill used in connection with utility installation or construction shall not include any granular or porous material but may include low strength flowable fill or other fill with low hydraulic conductivity.
- f. The utility contractor shall prepare a memorandum report describing the work performed, identifying the person performing the work and the date of the work, and confirming that the Cap Maintenance and Soil Management Plan was adhered to in completion of the work. A copy of the report shall be kept on file with the utility, the Owner and the Site manager, if any, and shall be filed with the WDNR.

5. **Subsurface Drilling Procedures and Requirements.** During subsurface drilling activities in the areas included in this Updated Cap Maintenance and Soil Management Plan, drilling contractors shall at all times maintain compliance with the following requirements to ensure the integrity of the Engineered Barriers and to avoid any potential cross contamination of soils and groundwater:
- a. The contractor performing the work shall be provided with a copy of this Updated Cap Maintenance and Soil Management Plan by the Owner and shall prepare a health and safety plan, appropriate to the work being performed. The work shall be supervised on-site by a qualified engineer or geologist.
 - b. All contractor personnel conducting or participating in work must be trained in hazardous site work as required by OSHA 29 CFR 1910.120 or its successor regulation. All soil sampling and drilling activities shall be conducted in accordance with ASTM D1586M-18 or its successor standard, and the specified environmental requirements contained in this document.
 - c. All drill cuttings and water/drilling mud generated during completion of the boring shall be transferred to appropriate 55-gallon drums or other suitable containers for storage and shall be managed in accordance with state law.
 - d. Following completion of the boring and sample collection, the borehole shall be properly abandoned, in accordance with state law, with a cement-based grout mixture pumped from the bottom of the boring to surface elevation concurrently with or prior to withdrawal of casing pipe.
 - e. All drill casings, rods, samplers, tools, rig, and any equipment that comes in contact (directly or indirectly) with the subsurface soils and groundwater shall be steam cleaned on-site prior to set up for drilling. The same steam cleaning protocols shall be followed before leaving the Site following completion of work. Steam cleaning shall be conducted in such a manner as to collect and contain residuals (water and soil) to prevent surface soil contamination. Residuals shall be drummed and managed in accordance with state law.

- f. A memorandum report shall be prepared describing the work performed, identifying the person(s) performing the work, the date of the work, and confirming that this Updated Cap Maintenance and Soil Management Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Owner and the Site manager, if any, and shall be filed with the WDNR.

Request for Deviations

The Owner shall not conduct any activities at the Site, specifically in the areas included in this Updated Cap Maintenance and Soil Management Plan that are not in compliance with this Updated Cap Maintenance and Soil Management Plan unless written approval to do so is obtained from the WDNR.

Amendment or Withdrawal of Cap Maintenance Plan

This updated Cap Maintenance and Soil Management Plan can be amended or withdrawn by the Owner or its successors with written approval of the WDNR.

Contact Information (as of December 2021):

Site Owner and Operator:

City of Beloit
c/o Public Works/Engineering Department
2400 Springbrook Court
Beloit, WI 53511
(608) 364-6690

Site Lease Holder:

Riverbend Stadium Authority, Inc.
525 Third Street, Suite 300
Beloit, WI 53511
(608) 362-8981

Please let me know if you have any questions or need any additional information.

Sincerely,
Brownfield Environmental Engineering Resources, LLC



Bradley A. Brown, P.E.
Principal



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.
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Inspections are required to be conducted (see closure approval letter): <input type="radio"/> annually <input type="radio"/> semi-annually <input type="radio"/> 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):
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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?
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier for soil <input type="checkbox"/> sediment cap <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier for soil <input type="checkbox"/> sediment cap <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier for soil <input type="checkbox"/> sediment cap <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier for soil <input type="checkbox"/> sediment cap <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier for soil <input type="checkbox"/> sediment cap <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N
		<input type="checkbox"/> monitoring well <input type="checkbox"/> cover/barrier for soil <input type="checkbox"/> sediment cap <input type="checkbox"/> other:			<input type="radio"/> Y <input type="radio"/> N	<input type="radio"/> Y <input type="radio"/> N

Continuing Obligations Inspection and Maintenance Log

Form 4400-305 (R 7/20)

Page 2 of 2

BRRTS No. _____

Activity (Site) Name _____

{Click to Add/Edit Image}

Date added:

Title:

{Click to Add/Edit Image}

Date added:

Title: