



May 29, 2024

Jack Rabenn
Crow Holdings Industrial
318 N. Carpenter Street, Suite 250
Chicago, IL 60607
Sent Via Email Only to jrabenn@crowholdings.com

Subject: Liability Clarification and “No Action Required” Determination Letter
Former USAF Reserve 440th Tact. Air Wing, 5950 S. Howell Avenue, Milwaukee, WI
Parcel #: 6869999100
BRRTS Activity Name: 440th Phase I Redevelopment FMR
BRRTS #: 07-41-555049, FID #: 241176980

Dear Jack Rabenn:

The Wisconsin Department of Natural Resources (DNR) received a request for a liability clarification and a “No Action Required” determination request from Chelsea Corson from The Sigma Group, Inc. on behalf of Crow Holdings Industrial on May 21, 2024, (Request). The Request was submitted with the appropriate review fee for the site location (Property) identified above. The purpose of this letter is to provide Crow Holdings Industrial clarification as to environmental liabilities and current environmental conditions at the Property. Wisconsin Statutes (Wis. Stat.) § 292.55(1)(d)1 authorizes the DNR to issue a letter to a person seeking assistance concerning the liability of a person owning or leasing a property for environmental pollution at a property, the type and extent of environmental pollution at a property, the adequacy of an environmental investigation, or any other matter related to a request for assistance. This type of letter contains a DNR determination as to whether response actions are needed under Wisconsin Administrative Code (Wis. Admin. Code) chs. NR 700 to 799 based on the discharge of one or more hazardous substances, or the presence of environmental pollution at the Property. The DNR based this letter on review of the current site file.

PROPERTY USE

The Property is a former air reserve station on a 100-acre parcel of land south of General Mitchell International Airport. The parcel is currently being used for aviation and commercial/industrial purposes but will be redeveloped soon. The future use will also be aviation and commercial/industrial purposes.

Refer to the attached Figure 10 and Figure 11.

BACKGROUND AND ENVIRONMENTAL SUMMARY

The Property was developed around 1955 for the use as the 440th Air Reserve Station, occupied by the United States Air Force for aircraft maintenance and fueling, training facilities, administration, and housing. The property is being redeveloped to include a large, single-story, slab-on-grade warehouse/cargo facility with adjoining office space, associated concrete paved drives, truck docks, parking, an underground stormwater basin, utilities, and replacement tarmac.

In 2023, The Sigma Group, Inc. conducted soil sampling to in order to satisfy Wis. Admin. Code ch. NR 718 criteria for soil management during the proposed redevelopment. Numerous samples were collected across the redevelopment area at varying depths. Samples were submitted for laboratory analysis for volatile organic

compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), metals, polychlorinated biphenyls (PCBs), organopesticides, cyanide, and per- and polyfluoroalkyl substances (PFAS).

This No Action Required determination is specific to PAHs and PCBs exceeding Wis. Admin. Code. ch. NR 720 residual contaminant levels in the following locations: SB-12, SB-13, SB-21, SB-33, SB-46, SB-48, SB-53, SB-59, SB-60, SB-75, SB-87, and SB-88. Locations with PAH and PCB exceedances will be excavated and placed in berms and capped with at least one foot of clean soil and top seed. Based on this information, no action is required by the DNR to further investigate contamination identified in these samples.

DETERMINATIONS

Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700 to 799 require those who are responsible for a hazardous substance discharge or environmental pollution to take actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state. Wis. Stat. § 292.55 authorizes the DNR to issue clarification letters concerning liability for environmental pollution.

The data summarized above indicates that one or more hazardous substance discharges or environmental pollution has been discovered on the Property. However, based on the information provided at this time and the criteria in Wis. Admin. Code § NR 716.05(2)(a) and Wis. Admin. Code §§ NR 708.09(1) and (2), the DNR has determined that no response actions, including further site investigation activities, are required under Wis. Admin. Code chs. NR 700 to 799 to respond to the identified discharges or environmental pollution.

Soil Management

As described above, low-level contamination is present in the soil in the locations identified above. The concentrations of PAHs and PCBs detected in the soil do not require further action at this time, but this soil may require management as a solid waste if it is excavated in the future. The property owner at the time of excavation must determine whether the material is considered solid or hazardous waste and ensure that any storage, grading, excavation, or disposal is in compliance with applicable regulations. Soil that meets the criteria to be considered “exempt soil” may be managed without DNR approval. See *Exempt Soil Management: A Self-Implementing Option for Soil Excavated During a Response Action under Wis. Admin. Code chs. NR 700 through NR 750 Applicability (RR-103)* for more information (visit dnr.wi.gov, search “RR-103”). Contaminated soil may be managed in accordance with Wis. Admin. Code ch. NR 718 with prior DNR approval.

As with any environmental assessment, some areas of the Property were not assessed, the number of samples collected were limited based on professional judgment and financial considerations, and environmental samples were not analyzed for all parameters. This letter relates and refers only to those conditions described above and to information and data you submitted to the DNR in your request for this letter. The DNR makes no determination concerning the presence or absence of hazardous substances or environmental pollution on the Property other than those identified in the documents and reports listed above, which you submitted to the DNR. In the future, if the DNR becomes aware of new information concerning the contaminants referenced above or the presence of any other contaminants on the Property, the DNR will evaluate that data at that time to determine if any response actions are required.

CLOSING

This letter, site, and case-related information and DNR contacts can be found online in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW); go to dnr.wi.gov and search “BOTW.” Use the BRRTS ID # found at the top of this letter. The site can also be found on the map view, Remediation and Redevelopment Sites Map (RRSM) by searching “RRSM.”

440th Phase I Redevelopment FMR (BRRTS #: 07-41-555049)
May 29, 2024

Page 3

If you have any questions regarding this letter, please contact me at (414) 750-7030 or riley.neumann@wisconsin.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Riley D. Neumann". The signature is fluid and cursive, with a long horizontal stroke at the end.

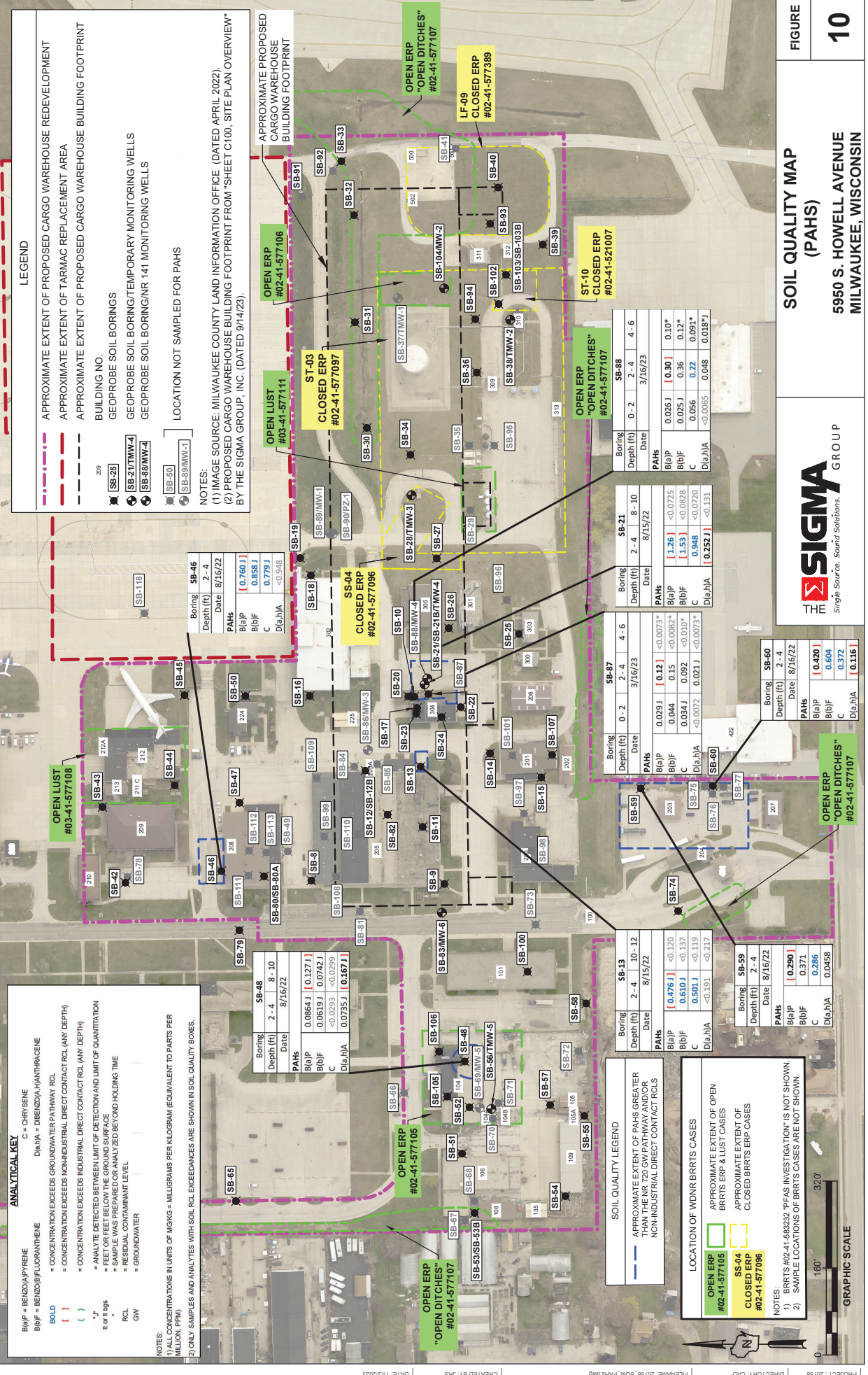
Riley D. Neumann
Hydrogeologist/Project Manager
Remediation and Redevelopment Program

Attachments:

Soil Quality Map (PAHs), Figure 10
Soil Quality Map (PCBs), Figure 11

cc:

Chelsea Corson, The Sigma Group, Inc. (electronic)



LEGEND

- APPROXIMATE EXTENT OF PROPOSED CARGO WAREHOUSE REDEVELOPMENT
- APPROXIMATE EXTENT OF TARMAC REPLACEMENT AREA
- APPROXIMATE EXTENT OF PROPOSED CARGO WAREHOUSE BUILDING FOOTPRINT
- BUILDING NO.
- GEOPROBE SOIL BORINGS
- GEOPROBE SOIL BORING/TEMPORARY MONITORING WELLS
- GEOPROBE SOIL BORING/NR 141 MONITORING WELLS
- LOCATION NOT SAMPLED FOR PAHS

ANALYTICAL KEY

- Blo/P = BENZO(A)PYRENE
- Blo/P = BENZO(B)FLUORANTHENE
- C = CHRYSENE
- Dib/a = DIBENZO(A,H)ANTHROCENE
- BOLD = CONCENTRATION EXCEEDS GROUNDWATER PATHWAY RCL
- () = CONCENTRATION EXCEEDS NON-INDUSTRIAL DIRECT CONTACT RCL (ANY DEPTH)
- () = CONCENTRATION EXCEEDS INDUSTRIAL DIRECT CONTACT RCL (ANY DEPTH)
- * = ANALYTE DETECTED BETWEEN LIMIT OF DETECTION AND LIMIT OF QUANTIFICATION
- ft or f logs = FEET OR FEET BELOW THE GROUND SURFACE
- RCL = REGULATORY ANALYZED BEFORE HOLDING TIME
- GW = GROUNDWATER

NOTES:

- ALL CONCENTRATIONS IN UNITS OF MG/KG = MILLIGRAMS PER KILOGRAM (EQUIVALENT TO PARTS PER MILLION, PPM)
- ONLY SAMPLES AND ANALYTES WITH SOIL RCL EXCEEDANCES ARE SHOWN IN SOIL QUALITY BOXES.

NOTES:

- IMAGE SOURCE: MILWAUKEE COUNTY LAND INFORMATION OFFICE (DATED APRIL 2022)
- PROPOSED CARGO WAREHOUSE BUILDING FOOTPRINT FROM "SHEET C100, SITE PLAN OVERVIEW" BY THE SIGMA GROUP, INC. (DATED 9/14/23).

APPROXIMATE PROPOSED CARGO WAREHOUSE BUILDING FOOTPRINT

SOIL QUALITY LEGEND

- APPROXIMATE EXTENT OF PAHS GREATER THAN THE NR 720 GW PATHWAY AND/OR NON-INDUSTRIAL DIRECT CONTACT RCLs
- LOCATION OF WDNR BRRTS CASES
- OPEN ERP #02-41-577105
- SS-04 CLOSED ERP #02-41-577096
- OPEN ERPs "OPEN DITCHES" #02-41-577107
- BRRTS #02-41-583929
- PEAS INVESTIGATION IS NOT SHOWN
- BRRTS CASES ARE NOT SHOWN

Boring	Depth (ft)	Date	PAHS
SB-46	2 - 4	8/16/22	Blo/P [0.760 J] Bib/F [0.858 J] C [0.779 J] Dib/a <0.948
SB-18	2 - 4	8/16/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-21	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-20	2 - 4	3/16/23	Blo/P [0.291 J] Bib/F [0.044] C [0.0341] Dib/a <0.0072
SB-74	203	8/15/22	Blo/P [0.476 J] Bib/F [0.610 J] C [0.501 J] Dib/a <0.193
SB-59	2 - 4	8/15/22	Blo/P [0.290 J] Bib/F [0.371 J] C [0.286 J] Dib/a 0.0458

Boring	Depth (ft)	Date	PAHS
SB-19	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-27	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-28	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-29	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-30	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-31	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-32	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-33	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-34	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
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SB-129	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-130	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-131	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-132	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-133	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-134	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-135	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-136	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-137	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-138	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-139	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-140	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-141	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-142	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-143	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-144	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0.252 J]
SB-145	2 - 4	8/15/22	Blo/P [1.26 J] Bib/F [1.53 J] C [0.948] Dib/a [0

