



March 13, 2023

Mr. Jack Rabenn
Crow Holdings Industrial
318 N. Carpenter Street, Suite 250
Chicago, IL 60607

Subject: Review of *Development-Related Site Investigation Work Plan*
Former 440th Air Reserve Station, 5950 S. Howell Avenue & 402 E. College Avenue
Milwaukee, WI
BRRTS #: 02-41-583232, FID #: 241176980

Dear Mr. Rabenn:

On January 30, 2023, the Wisconsin Department of Natural Resources (DNR) received the *Development-Related Site Investigation Work Plan* (SIWP), dated January 30, 2023, submitted on behalf of Crow Holdings Industrial by The Sigma Group, Inc. The SIWP was submitted with the associated technical assistance fee for DNR review and response.

SIWP Review

The DNR reviewed the SIWP for compliance with Wis. Admin. Code ch. NR 716. Based on the review of the currently available information, the DNR generally concurs with the site investigation activities proposed within the SIWP and provides the following comments:

- Data from the open and closed sites at the 440th, including the per- and polyfluoroalkyl substances data from BRRTS #: 02-41-583232, should be incorporated and presented in tables and figures in the next report. Other sites were not mentioned within the SIWP, including BRRTS #: 02-41-577107 and BRRTS #: 03-41-002811.
- Data collected from this investigation, as well as data from the closed and other open cases at the 440th, need to be considered and used for vapor intrusion screening using the DNR guidance document RR-800, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*.
- Consider analyzing the samples proposed to be collected at 4-6 feet below ground surface for the analysis of polychlorinated biphenyls to document vertical delineation.
- The SIWP mentions that a Phase I and a Phase II were completed for this redevelopment. These reports should be submitted for inclusion in the DNR file.
- Consider discussing the currently open and closed cases at the 440th with the Air Force. The Air Force has been attempting to remove the continuing obligations from the ST-10 site and it may be possible to assist them with other sites as well.
- Potable wells were noted on-site. If these wells will be abandoned during the redevelopment of the site, the DNR Drinking and Groundwater Program will need to be consulted for proper methods and documentation.
- Delineated wetlands were noted on Figure C001. The DNR Wetlands and Waterways Program will need to be consulted if disturbance of these areas is planned.

Former 440th Air Reserve Station (BRRTS #: 02-41-583232)
March 13, 2023

Page 2

The site investigation can be an iterative process. Additional sampling may indicate that further assessment is needed to define the degree and extent of contamination in all affected media.

The DNR appreciates your efforts to address the contamination at these sites. If you have any questions regarding this letter, please contact me, the DNR Project Manager, at (414) 750-7030 or via email at riley.neumann@wisconsin.gov.

Sincerely,



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

cc: Chelsea Corson, The Sigma Group, Inc. (electronic)
Brian Dranzik, Milwaukee County (electronic)
Kay Grosinske, Air Force Civil Engineering Center (electronic)