



February 6, 2024

Ms. Kay Grosinske
AFCEC
2261 Hughes Avenue, Building 171, Suite 155
Joint Base San Antonio – Lackland, Texas 78236
Sent Via Email Only to kay.grosinske@us.af.mil

Subject: Review of Draft-Final 2023 Site Inspection Report
Former 440th Air Reserve Station, 300 E. College Avenue, Milwaukee, WI
BRRTS #s: 03-41-577108, 03-41-577109, 03-41-577110, 03-41-577111
FID #: 241176980

Dear Ms. Grosinske:

On December 14, 2023, the Wisconsin Department of Natural Resources (DNR) received the *Draft-Final 2023 Site Inspection Report* (SIR), which documents the site investigation activities at four former underground storage tank areas located on the former 440th Air Reserve Station. The applicable technical assistance fee for providing a review and response, in accordance with Wis. Admin. Code § NR 749.04 (1), was provided.

SIR Review

The DNR reviewed the SIR for compliance with Wis. Admin. Code ch. NR 716. Based on the review of the currently available information, additional actions are required to achieve compliance with Wis. Admin. Code ch. NR 716:

- UST 212: current data indicates that soil is in exceedance of respective Wis. Admin. Code ch. NR 720 residual contaminants levels (RCLs) for non-industrial direct contact and pathway-to-groundwater and groundwater exceeds applicable Wis. Admin. Code ch. NR 140 Enforcement Standards (ES). The degree and extent of soil and groundwater contamination is currently undefined. The proposal to request closure without continuing obligations is not appropriate. Two possible paths to achieve case closure are:
 - Define the degree and extent of soil and groundwater contamination and achieve closure with residual soil and residual groundwater continuing obligations, or
 - Conduct soil excavation to remove the exceedances and conduct post-excavation confirmation sampling to demonstrate that all remaining soil is below applicable Wis. Admin. Code ch. NR 720 RCLs and install a Wis. Admin. Code ch. NR 141 compliant monitoring well(s) (including well development) to demonstrate that groundwater is below the applicable ES. This excavation could be coordinated with the upcoming redevelopment.
- UST 215: current data indicates that soil exceeds the Wis. Admin. Code ch. NR 720 RCLs for industrial direct contact and pathway-to-groundwater. Further soil sampling is needed to define the degree and extent of soil contamination. DNR concurs with the recommendation to conduct additional soil sampling and conduct soil removal with post-excavation confirmation sampling. Sidewall and base samples should be collected. To achieve site closure without continuing obligations, the soils in exceedance of Wis. Admin. Code ch. NR 720 RCLs need to be removed. Further groundwater assessment does not appear necessary unless field observations indicate contamination in areas away from the temporary well locations near the water table.

- UST 219: current data indicates that soil exceeds the Wis. Admin Code ch. NR 720 RCLs for non-industrial direct contact and pathway-to-groundwater. Groundwater concentrations exceeded the Wis. Admin. Code ch. NR 140 Preventive Action Limit (PAL). The degree and extent of soil and groundwater contamination is currently undefined. DNR concurs with the recommendation to conduct additional soil sampling and conduct soil removal with post-excavation confirmation sampling. The excavation should address the noted visual contamination at the bottom of the former tank bed. Sidewall and base samples should be collected. To achieve site closure without continuing obligations, the soils in exceedance of Wis. Admin. Code ch. NR 720 RCLs need to be removed. Confirmation groundwater sampling is required at the TW-01 location and near the dispenser (SB-05). Sampling should be conducted with Wis. Admin. Code ch. NR 141 compliant monitoring wells (including development).
- UST 8002: current data indicates that soil exceeds the Wis. Admin. Code ch. NR 720 RCLs for non-industrial direct contact and pathway-to-groundwater. Groundwater concentrations exceeded Wis. Admin. Code ch. NR 140 PALs. The degree and extent of soil and groundwater contamination is currently undefined. The proposal to request closure without continuing obligations is not appropriate. Two possible paths to achieve case closure are:
 - Define the degree and extent of soil and groundwater contamination and achieve closure with residual soil and possibly residual groundwater continuing obligations, or
 - Conduct soil excavation to remove the exceedances and conduct post-excavation confirmation sampling to demonstrate that all remaining soil is below applicable Wis. Admin. Code ch. NR 720 RCLs and install a Wis. Admin. Code ch. NR 141 compliant monitoring well(s) (including well development) to demonstrate that groundwater is below the applicable ES. This excavation could be coordinated with the upcoming redevelopment. Groundwater confirmation samples are needed for TW-01 and TW-04.
- General:
 - The next submittals should contain cross-sections for each site, as required in Wis. Admin. Code § NR 716.15(4)(d).
 - The next submittals should include the old sampling data (from the preliminary assessment) on tables and figures.
 - Emerging contaminant scoping statements are required for each site.

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