

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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December 22, 2015

Ms. Kay Grosinske
USAF Civil Engineer Center
2261 Hughes Avenue, Suite 155
Lackland AFB, TX 78236-9821

Subject: File Review for
440th Support Group, 300 E. College Ave., Milwaukee, WI 53207
DNR BRRTS Activity # 02-41-000602
DNR FID #: 241176980

Dear Ms. Grosinske:

Your Request

On September 11, 2015, the Wisconsin Department of Natural Resources (DNR) received a request from your consultant (AECOM) to close the site identified above. The information available on the Bureau of Remediation and Redevelopment Tracking System (BRRTS) does not indicate that this case was opened to address a specific release. AECOM reasoned that this case was opened to administratively track activities being conducted at the property as a whole. As all other cases associated with this site are closed, and as base realignment and closure activities are complete, case 02-41-000602 should also be closed.

DNR Determination

When contamination is discovered at a property, the DNR will assign it a Facility Identification (FID) number, and will track separate chemical release incidents at the property with a unique BRRTS number. Thirteen BRRTS numbers are open under the FID number assigned to this property. As AECOM indicated, only 02-41-000602 is considered an open case. However, these 13 cases do not accurately reflect all the contaminant releases that were identified at this property during the various stages of environmental investigation that occurred there. A review of the DNR case file revealed numerous contaminant releases that were never fully investigated or addressed. To be consistent with current DNR practices, a BRRTS number will now be assigned to each of these contaminant releases. Each case will need to be fully investigated and remediated to the extent practicable as outlined under NR 700 wis. Ad. Code. A closure request, or a request for a 'No Action Required' determination if contaminate concentrations are below current standards, will need to be made for each identified release at this site. The closure process followed for the release identified at ST-10 (BRRTS # 02-41-521007) is representative of the standard DNR closure process. Once a unique case number has been assigned to each release, the umbrella number 02-41-000602 will be likely be removed from the BRRTS database.

Previously Closed Sites Without an Individual BRRTS Number

The DNR has already issued case closure letters for nine contaminant releases without assigning each an individual BRRTS number. To ensure that these nine release areas can be easily identified in the future they will now be assigned a unique BRRTS number and will be identified on DNR's RR Sites Map which is available to the public online. The nine cases include the following:

- FT-01, closed on January 6, 2004.
- SS-02, closed April, 29, 2001
- DP-08, closed on April 3, 2001
- LF-07, closed on April 3, 2001
- LF-06, closed on March 29, 2001
- LF-05, closed in 2000
- LF-09, closed in 2000
- SS-04, closed on August 2, 1999
- ST-03, closed on August 2, 1999

Areas Where a Contaminant Release Warrants Additional Investigation

Through reviewing the case file, the DNR has identified other significant contaminant releases that have not been closed. A new environmental remediation case will now be opened to address each of these identified releases. Each release will need to be investigated and remediated to the extent practicable before a closure request can be prepared. Areas that require additional investigation and/or remediation to close include the following:

- 1) The OWS 104 area, OWS 308 area, and the open ditches that were investigated and remediated. Documentation in the file suggests that a closure request could already be made for these three areas.
Look at OWS renewal
- 2) A release was identified at the UST systems removed from areas 212, 219, 215, and 8002. A determination must be made as to whether additional investigation is needed to address these impacts. Any needed investigation will need to be completed prior to requesting closure for these areas.

*Cost for SE?
Mon or Wed
Look in 102771
BESERC*

Areas Where a Contaminant Release Warrants No Action

Other contaminant releases have been identified at the property that are not expected to have resulted in significant impact to the environment. No further investigation or remediation may be required for these release areas. If there is reason to believe that the release was not significant, a request for a 'No Action Required' determination can be made to the DNR for each area. Where the DNR concurs with this request, the release area will be tracked in BRRTS as a 'No Further Action' case and you will not be required to conduct additional actions to address the contamination. If the DNR does not concur, a new environmental remediation case will be opened. You will need to provide a justification to the DNR regarding each release area. Available information suggests that the contaminant releases identified in the following areas may not require additional actions to address:

- 3) USTs 103, 200, and 302.
- 4) OWSs 208, 217, 219, 302, 303, 310, 314, 7106.
- 5) One UST located at 215 (identified by Stiles Environmental in 1998)
- 6) Aircraft Parking Apron and the area east of the apron
- 7) The flare burn area

You may request a written determination from the DNR regarding the 'No Action Required' status for these areas, but under NR 749 a \$700 fee will apply. However, the request for a written determination

is optional.

Areas Where a Release has not Been Identified

A number of areas of the site were inspected and a contaminant release was not discovered. The DNR will require no additional investigation in these areas. However, if evidence of a release (either documentation or physical evidence) is discovered in the future, it must be immediately reported to the DNR. Areas that were reportedly inspected and found no evidence of a contaminant release include the following:

- 8) USTs 104, 107, 112, and 113.
- 9) OWS 308.


Request for Documentation

The DNR has found a number of references in available documentation to reports that are not in the DNR case file. Copies of the following reports will need to be provided to the DNR for review:

- 10) February 2010 Phase II Environmental Assessment Report.
- 11) 2003 Site-Wide Groundwater Monitoring Report. *2003 GW Mon Rap.*
- 12) 1998 Report provided by Stiles Environmental. *Removal of USTs 1-3 UST Details*
- 13) 1995 Report provided by Tony's Cement Works. *1995 Tony's Cement pg 133*

We appreciate your continued efforts to investigate and cleanup contamination identified at this site. If you have any questions regarding this letter, please contact me at (414) 263-8541 or by email at paul.grittner@wisconsin.gov.

Sincerely,



Paul Grittner
Hydrogeologist
Remediation & Redevelopment Program

cc: Ken Brown, AECOM, 1555 N. Rivercenter Drive, Suite 214, Milwaukee, WI 53212
SER File