State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
1027 W. Saint Paul Avenue
Milwaukee WI 53233

Tony Evers, Governor
Preston D. Cole, Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

October 11, 2022

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 UFP-QAPP
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 June 28, 2022, the Wisconsin Department of Natural Resources (DNR) received the Uniform Federal Policy – Quality Assurance Project Plan (UFP-QAPP) regarding the site inspections to be conducted at four former underground storage tank (UST) locations located at the former 440th Air Reserve Station (ARS). A review fee for DNR review and a written response was received on August 10, 2022.

Background

The base was initially established in February 1952 by the U.S. Air Force when the 924th Reserve Training Wing was activated at General Mitchell International Airport (GMIA). The 924th Reserve Training Wing was redesignated as the 438th Fighter Bomber in July 1952 and then redesignated again to the 247th Air Force Reserve Training Center. In November 1957, the 247th was deactivated when the 440th Troop Carrier Wing was transferred to GMIA. The mission of the 440th was to provide combat-airlift support, paratroop and equipment drops, airlift troops and equipment to forward areas, and aeromedical evacuations. The 440th officially closed on February 2, 2008, as part of the 2005 Base Realignment and Closure Commission. Currently, the former 440th is home to Milwaukee County's MKE Regional Business Park, which leases hangar and office space in support of GMIA and other customers.

UFP-QAPP Review

The UFP-QAPP focuses on the locations of four former USTs on the base. The locations include UST 212, UST 215, UST 219, and UST 8002. UST 212 is the location of a former 1,000-gallon UST that contained diesel fuel for an emergency generator. UST 212, which was installed in 1982 and removed in 1995, was located between Buildings 212 and 209. UST 215 is the location of three former USTs holding fuel oil for the central heat plant, Building 215. The USTs were installed in 1956, with the third being installed in 1982. All three tanks were removed in 1998. UST 219 is the location of a former 6,000-gallon UST that contained diesel for vehicle refueling. UST 219 was installed in 1976 and removed in 1995. Finally, UST 8002 was located in the petroleum, oil, lubricant area and consisted of three 5,000-gallon fuel USTs, the JP-4 fuel piping that ran from each tank to a fueling island/dispenser, and one 550-gallon oil-water separator. This entire system was removed in 1994. Tanks were removed from all of these locations due to them being out of compliance with Wisconsin Department of Industry, Labor, and Human Relations.

The DNR reviewed the UFP-QAPP 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 inspection activities proposed within the UFP-QAPP and provides the following comments:

General:

- On future data tables, soil sample results should be compared to all three DNR Residual Contaminant Levels: soil to groundwater pathway, non-industrial direct contact, and industrial direct contact.
- On future data tables, vapor sample results should be compared to all three DNR Vapor Risk Screening Levels: Residential, small commercial, and large commercial/industrial.
- Currently, naphthalene is not listed in the table of analytes for the TO-15 soil vapor samples (see page 68 of the UFP-QAPP). Ensure that naphthalene is captured in the TO-15 analysis for soil vapor.
- Ensure that the project action limits are correct, as a few appear to be incorrect. This includes, but may not be limited to:
    - The direct contact value for lead is incorrectly listed as the background threshold value (52 milligrams/kilogram – see page 57).
    - The Xylene Enforcement Standard and Preventive Action Limit should be in milligrams/liter rather than micrograms/liter (see page 60).
    - The benzo(a)pyrene non-industrial direct contact RCL is incorrect (see page 65).
- During review of the UFP-QAPP, there was mention of previous reports and sampling data. To ensure a comprehensive report and review of site data, include all previous sampling data in future submittals.
- Future documents that display sampling results and provide conclusions and recommendations should be signed and certified by a Hydrogeologist as defined in Wis. Admin. Code § NR 712.03, or a functional equivalent.
- If available, include Wisconsin lab certification documents in Appendix D.
- A vapor intrusion screening assessment should be conducted following the guidance of RR-800, *Addressing Vapor Intrusion at Remediation and Redevelopment Sites in Wisconsin*. Screening for petroleum sites can be found in Section 3.5. Typically, if a site screens in via the criteria in RR-800, sub-slab sampling is required.
- Per Wis. Admin. Code § NR 716.14, sampling results shall be reported to the DNR and to the property owner, and occupants or off-site properties as appropriate, within 10 business days of receiving the sample results. DNR Form 4400-249 (https://dnr.wi.gov/files/PDF/forms/4400/4400-249.pdf) can be used to send in the sampling data.
- NR 700 semi-annual reports are required until the case is closed.

UST 212:

- The UFP-QAPP states that impacted soil was observed in the tank piping run during tank removal, near soil sample S3. The S3 soil sample indicates a release occurred in that area. Current sampling points do not appear to fully investigate the area of S3. Consider whether additional sampling points are needed to further investigate the confirmed contamination, vertically and laterally, in the area of S3.

UST 215:

- The UFP-QAPP states that impacted soil was observed near the tank piping run of Tank 2 during the removal. Currently, there does not appear to be a sample within that area. Consider including a sampling point for soil and groundwater to investigate the observed contamination.

UST 219:

- Previous soil samples indicate that the east bottom of the former tank, near sample S1, and the tank piping run near S4 were leaking. Evaluate if the current sampling locations would adequately investigate the confirmed contamination, vertically and laterally, in those areas, including soil south of S4.

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

cc: Kenneth Brown, AECOM (electronic)