



September 2, 2020

1st Lieutenant Brian Schrader
128th Air Refueling Wing
1919 East Grange Avenue
Milwaukee, WI 53207

Subject: Review of *Final Feasibility Study Report*
General Mitchell Air National Guard Base (CG019), 1919 E. Grange Ave., Milwaukee, WI
BRRTS #: 02-41-579106, FID #: 241496970

Dear 1st Lieutenant Schrader:

On August 27, 2020, the Wisconsin Department of Natural Resources (DNR) received the *Final Feasibility Study Report* (Report), dated August 31, 2020. The Report was prepared on behalf of the Wisconsin Air National Guard by their consultant, Wood. DNR has completed our review of the Report and this letter summarizes our comments.

Background

The 128th Air Refueling Wing (ARW) is located at the Air National Guard (ANG) base at General Mitchell International Airport (GMIA). The 128th ARW was organized at General Mitchell Field between 1946 and 1948, and began its air refueling mission in the early 1960s. The ARW continues to operate at GMIA, providing fuel to U.S. military and allied aircraft, aero-medical evacuation, and the lift personnel and equipment to strategic locations.

Previous releases at the 128th ARW have been reported to the DNR. Previous and current investigations include, but are not limited to, the 1968 Westshore Pipeline release, during which approximately 600,000 gallons of gasoline were spilled, a jet fuel release from the aboveground receipt headers and associated underground piping at Building 610, known as the legacy spill, and a secondary release of jet fuel from an emergency vent located on the roof of Building 606.

This specific case, identified as CG019, is related to vinyl chloride (VC) in groundwater at concentrations exceeding the Wis. Admin. Code ch. NR 140 Enforcement Standard (ES). The exceedances have been observed primarily along an east-west drainage ditch on the north side of Prime Beef Drive. The source of the VC groundwater contamination is unknown. The DNR previously reviewed and responded to the *Draft-Final Remedial Investigation Report* (RI), which summarized the investigative activities conducted for five separate sites at the 128th Air Refueling Wing, including the CG019 site.

Comments

The DNR provided comments on the *Draft-Final Feasibility Study Report* in a letter dated August 18, 2020. To follow up on the August 18, 2020, letter, a meeting was conducted on August 26, 2020, to discuss the *Draft-Final Feasibility Study Report* letter. Representatives from DNR, Wood, and the 128th were in attendance. Additional comments were provided to Wood via email correspondence on August 27 and 28.

The DNR provides the following comments to summarize the recent meetings and correspondences:

- The DNR is conditionally approving the Feasibility Study. As we discussed during our meeting, the DNR is expecting to receive additional information to address our concerns with the selected remedy and to address our comments and concerns from previous review letters and meetings. Significant additional information related to the subsurface conditions must be provided, including sampling data reflecting current conditions, before DNR can review and approve any remedy that relies on an injection. DNR encourages you to consider selecting a monitored natural attenuation remedy as this appears to be most appropriate for the current conditions. Natural attenuation monitoring will likely provide documentation adequate to demonstrate that there is a stable or decreasing groundwater contamination plume and that the environment will be restored within a reasonable period of time, as required by Wisconsin Administrative Code. We understand the requested additional information will be provided in the future Remedial Action Workplan. Future documentation will be in compliance with the Wisconsin Administrative Code NR 700 rule series.
- If new groundwater samples are collected to determine current subsurface conditions to satisfy DNR concerns regarding the selected remedy, the new groundwater data should be used to assess the vapor intrusion pathway.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (414) 750-7030 or by email at Riley.Neumann@wisconsin.gov.

Sincerely,



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

cc: Saamih Bashir, Associate Engineer/Project Manager, Wood Group (electronic)