



August 31, 2020

File Ref BRRTS #: 02-41-579110
09-41-579110

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

Subject: Liability Clarification and “No Action Required” Determination, per Wis. Admin. Code NR § 716.05(2).
General Mitchell Air National Guard Base (RW010), 1919 E. Grange Ave., Milwaukee, WI
Parcel #: 6758999000

Dear 1st Lieutenant Schrader:

Purpose

The purpose of this letter is to provide you with clarifications as to environmental liabilities and current environmental conditions for the RW010 site at 1919 E. Grange Avenue, Milwaukee, Wisconsin (“the Property”). The Property is located in Milwaukee County, identified by tax parcel number 6758999000.

Summary Determination

Based on the data provided, there is no evidence that hazardous substance discharges have occurred on the Property and the Wisconsin Department of Natural Resources (“the Department”) has determined that that no response actions are required.

Request

On August 18, 2020, your consultant, Wood Environment & Infrastructure Solutions, Inc. (Wood) requested on your behalf that the Department issue a liability clarification letter under Wis. Stat. § 292.55. The letter contains a determination as to whether response actions are needed under the Wis. Admin. Code NR 700 rule series based on the discharge of one or more hazardous substances or presence of environmental pollution at the Property.

For the Department to make this determination, you have requested a review of the following documents:

- Remedial Investigation Report, prepared by Wood, dated October 2018
- No Further Action Decision Document, prepared by Wood, dated August 2020

The Department examined the reports listed above and provides the following summary of the case and opinions concerning environmental conditions at the Property.

Background and Summary of Environmental Conditions

The Property is located on the 128th Air National Guard Base, located at the General Mitchell International Airport, 1919 E. Grange Ave., Milwaukee, WI. The RW010 site is located towards the northern end of the Base and is the location of the former aircraft washing rack. The 128th was organized between 1946 and 1948 and began its air refueling mission in the early 1960s.

Initial sampling in 2014 indicated that Bis(2-ethylhexyl) phthalate (DEHP) exceeded the Wis. Admin. Code ch. NR 140 Enforcement Standard in groundwater samples collected across the RW010 site. To further investigate

these exceedances, permanent monitoring wells were installed across the site. Groundwater sampling in these wells identified Wis. Admin. Code ch. NR 140 Preventive Action Limit (PAL) exceedances of DEHP in the first of two rounds in six of eight wells. In the second round, concentrations were below all Wis. Admin. Code ch. NR 140 groundwater standards. Soil samples collected did not indicate a soil source of DEHP. No other analytes were found to exceed Wis. Admin. Code ch. NR 140 groundwater standards, and no other analytes exceeded any soil standards from Wis. Admin. Code ch. NR 720. Additional information provided by Wood indicates that the DEHP exceedances in groundwater were anomalous and not related to nor reflect site activities or conditions.

Liability Determination

Wis. Stat. ch. 292 and Wis. Admin. Code chs. NR 700-754 require those who are responsible for a hazardous substance discharge or environmental pollution to take actions necessary to respond to the contamination. Wis. Stat. § 292.55, authorizes the Department to issue clarification letters concerning liability for environmental pollution.

Information you submitted to the Department indicates that no hazardous substance discharge or environmental pollution has occurred on the Property. Therefore, further site investigation activities are not required, and no response action is required under Wis. Admin. Code chs. NR 700-754.

As with any environmental assessment, all areas of the Property were not assessed, the numbers of samples collected were limited based on professional judgment and financial considerations, and samples were not analyzed for all parameters. This letter relates and refers only to those conditions described above and to information and data you submitted to the Department in your request for this letter. The Department makes no determination concerning the presence or absence of hazardous substances or environmental pollution, other than those identified in the documents and reports listed above, which you submitted to us. In the future, if the Department becomes aware of new information concerning the contaminants referenced above, or the presence of other contaminants on the Property, the Department will evaluate that data at that time to determine if any response actions are required. Whenever possible, the Department requires the person who caused the discharge to take the appropriate response actions.

The Bureau for Remediation and Redevelopment Tracking System (BRRTS) identification number for this activity is shown at the beginning of this letter. The Department tracks information on all case determinations such as this letter in a Department database that is available online at dnr.wi.gov and search: "BOTW". Since there is no action required for this case, the Department will identify this site activity as a "No Action Required" determination.

If you have any questions, please contact me, the Department 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: Saamih Bashir, Wood (electronic)