



January 29, 2019

2nd Lt. Brian Schrader
128th Air Refueling Wing
1919 E. Grange Ave.
Milwaukee, WI 53207

Subject: Review of *Draft-Final Report*
128th PFAS Investigation, 1919 E. Grange Ave., Milwaukee, WI
BRRTS #: 02-41-582725, FID #: 241496970

Dear 2nd Lt. Schrader:

On September 14, 2018, the Wisconsin Department of Natural Resources (DNR) received a report titled *Draft-Final Report, FY16 Phase 1 Regional Site Inspections for Perfluorinated Compounds* (Report), dated September 14, 2018. The Report was prepared on Wisconsin Air National Guard's behalf by their consultant, Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec). DNR has completed our review of the Report and this letter summarizes our comments.

Background

The 128th Air Refueling Wing (ARW) is located on the eastern side of 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 United States military and allied aircraft, aero-medical evacuation, and the lift of personnel and equipment to strategic locations.

The National Guard Bureau is conducting site inspections for Per- and Polyfluoroalkyl Substances (PFAS) at multiple Air National Guard installations. The site inspections are in response to the use and storage of aqueous film forming foam (AFFF). AFFF was used for fire-fighting activities at the 128th ARW. A preliminary site assessment identified nineteen potential release locations (PRLs) based on areas where AFFF was potentially discharged or stored. Five PRLs were identified and removed from further inspection based on the findings of no known AFFF release, and one was removed from the list of PRLs because it is not located on the 128th ARW property.

A site inspection work plan was developed for the investigation of the remaining thirteen PRLs and the base boundary wells. A *Final Work Plan* was submitted to the DNR on October 13, 2017. The Report documents the investigation results proposed in the work plan.

Report Summary

The Report identifies multiple release locations at the 128th ARW and one location at Guard West. The objective of the site inspection was to identify presence or absence of PFAS at the PRLs and based on the findings: 1) determine if a PRL is eligible for a decision of no further action (NFA), 2) assess if PFAS are migrating off-base, and 3) provide data which can be used for developing data quality objectives if further investigations are recommended.

The Report focuses on the identified constituents of concern: perfluorooctanoic acid (PFOA), perfluorooctanesulfonic acid (PFOS), and perfluorobutane sulfonate (PFBS). These constituents of concern were analyzed in samples collected from soil, groundwater, surface water, and sediment. Additionally, three other compounds listed within the United States Environmental Protection Agency's Third Unregulated Contaminant Monitoring Rule list were included in lab analysis. These compounds include perfluoroheptanoic acid (PFHpA), perfluorohexanesulfonic acid (PFHxS), and perfluorononanoic acid (PFNA).

Amec performed site inspection activities at thirteen PRLs and at the 128th base boundary wells. Based on the findings of the investigation, Amec is recommending further investigation at eleven of the thirteen PRLs. For the remaining two PRLs, locations 3 and 4, Amec is recommending NFA.

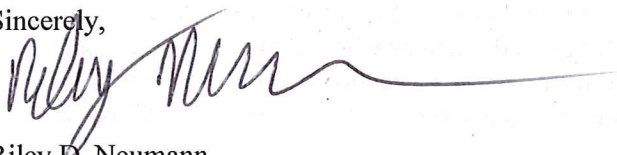
DNR Comments

The DNR has reviewed the Report in terms of Wis. Admin. Code ch. NR 716, which explains the requirements for site investigations and site investigation reports in Wisconsin. The DNR provides the following comments:

- The DNR is reviewing documentation associated with the PFAS investigation in terms of the NR 700 series. Wisconsin law requires the responsible party to define the degree and extent of contamination in all affected media. Additional investigation may be necessary to fulfill this requirement.
- The DNR understands that Amec is proposing additional groundwater investigation at eleven PRLs. Additional soil investigation was mentioned in the initial draft of the Report. Confirm if additional soil sampling will occur and if no additional soil sampling is planned, provide information on how the nature and extent of impacts will be adequately defined without additional soil data.
- Amec is proposing NFA for PRLs 3 and 4. The DNR will not formally close these locations due to the limited knowledge of PFAS, but additional investigation will not be required at this time. Further work may become necessary as knowledge surrounding PFAS grows.
- In the next steps of the investigation of degree and extent of contamination, consider how off-site impacts will be assessed, including, but not limited to, an assessment of Bailey's Pond and any outfalls.

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) 263-8699, or by email at Riley.Neumann@wisconsin.gov.

Sincerely,



Riley D. Neumann
Hydrogeologist
Remediation & Redevelopment Program

cc: Mr. Keith Freihofer, National Guard Bureau (electronic)
Ms. Judy Fassbender, Wisconsin Department of Natural Resources (electronic)
Ms. Angela Carey, Wisconsin Department of Natural Resources (electronic)