



September 1, 2022

Captain Brian Schrader  
128<sup>th</sup> Air Refueling Wing  
1919 E. Grange Avenue  
Milwaukee, WI 53207

Subject: Approval to Manage Contaminated Soil under Wis. Admin. Code § NR 718.12 on Site  
128<sup>th</sup> PFAS Investigation, 1919 E. Grange Avenue, Milwaukee, WI  
DNR BRRTS Activity #: 02-41-582725, FID #: 241496970

Dear Captain Schrader:

On June 30, 2022, the 128<sup>th</sup> Air Refueling Wing submitted an approval request document requesting to manage between 110 and 150 cubic yards of contaminated soil on the same site from which it will be excavated in accordance with Wis. Admin. Code § NR 718.12. Supplemental information regarding this request was also provided on August 19, 2022. The Wisconsin Department of Natural Resources (DNR) received all applicable technical assistance and database fees for providing review and response, in accordance with Wis. Admin. Code § NR 749.04 (1).

Building 522 on the 128<sup>th</sup> Air Refueling Wing base is undergoing renovation and will include trench excavations for utilities. Excavations will generate between 110 and 150 cubic yards of soils. Contaminated material is impacted by polycyclic aromatic hydrocarbons, per- and polyfluoroalkyl substances, and polychlorinated biphenyls. The excavated material will be placed next to the excavations and returned to the same locations once utilities are installed and backfill/gravel is placed. The excess soils will be taken to a licensed landfill for disposal. The 128<sup>th</sup> Air Refueling Wing will maintain the pervious and impervious areas over the excavations in accordance with their cover maintenance plan.

#### **Wis. Admin. Code § NR 718.12 Approval**

This letter grants an approval to manage contaminated soil under Wis. Admin. Code § NR 718.12 on site. Approval is based on the following:

#### **Compliance with Locational Criteria**

Managing contaminated soil in areas of the site identified on the Soils Cover Plan figure of the approval request document will meet the locational criteria listed under Wis. Admin. Code § NR 718.12 (1) (c).

#### **Grant of exemption to Wis. Admin. Code § NR 718.12 (1) (c) 5**

In consideration of site conditions and the nature of backfilling the excavations with the same material removed from them, in the same location, the DNR grants an exemption to the location criteria of Wis. Admin. Code § 718.12 (1) (c) 5 and will allow placement of contaminated soil material within 3 feet of the high groundwater level.

#### **Characterization of Soil to be Excavated**

Soil samples were collected for analysis of contaminants previously detected or expected to be present at this site including per- and polyfluoroalkyl substances, polycyclic aromatic hydrocarbons, volatile organic compounds, polychlorinated biphenyls, and metals from areas most likely to contain residual contamination. Based on an estimated volume of 110 to 150 cubic yards of material, and a sampling frequency of four total samples, the sampling protocol described in Wis. Admin. Code § NR 718.12 (1) (e) was met.

### **Submittal of a Soil Management Plan**

A complete soil management plan, as defined by Wis. Admin. Code §§ NR 718.12 (2) (b) and (c), was provided to the DNR.

### **Assessment of Risk Posed by Soil Management**

The proposed management of solid waste at the 128<sup>th</sup> Air Refueling Wing is expected to meet the criteria of Wis. Admin. Code §§ NR 726.13 (1) (b) 1 to 5.

### **Notice Provided Prior to Commencing Soil Management Activities**

Per Wis. Admin. Code § NR 718.12 (2), the DNR was provided with written notice at least seven days prior to commencing the proposed material management.

### **Other Information**

- 1) Any hazardous substance discharge discovered during contaminated soil management activities must be reported to the DNR following the requirements of Wis. Admin. Code ch. NR 706.
- 2) Contaminated soil management activities approved by this letter are scheduled to be completed within 12 months. Notify the DNR if this schedule will change.
- 3) Unless otherwise directed by the DNR, documentation of contaminated soil management activities shall be provided within 60 days of the completion of this project. The documentation must comply with the requirements of Wis. Admin. Code § NR 724.05 (2) and § NR 724.15 (3). Documentation must include:
  - a. A cover letter that contains the information required by Wis. Admin. Code § NR 724.05(2) (e) 1.
  - b. Owner contact and property location information for the 128<sup>th</sup> Air Refueling Wing.
  - c. Maps, drawings and cross sections that depict how contaminated soil was managed.
  - d. A synopsis of the work conducted and an explanation as to how it complied with the contaminated soil management plan and the conditions in this approval.
  - e. A description of any changes made to the planned management activity and an explanation as to why they were necessary for the project.
  - f. Any field observations or results of monitoring conducted during the management activity.
  - g. A description of how new site conditions are protective of human health, safety, welfare and the environment at the 128<sup>th</sup> Air Refueling Wing.
  - h. A revised cover maintenance plan, if needed.

The DNR will request that incomplete documentation be amended as allowed by Wis. Admin. Code § NR 724.07 (2).

- 4) This approval is granted under Wis. Admin. Code § NR 718.12 and applies only to the specific activities described within the submitted approval request document. Any contaminated soil that is excavated or otherwise disturbed at the 128<sup>th</sup> Air Refueling Wing, not covered under this or another approval, must be managed in compliance with the requirements of Wis. Admin. Code chs. NR 500 through NR 599. The management of contaminated soil on a property that does not comply with these rules may be considered a hazardous substance discharge or environmental pollution and would be required to be addressed by the process outlined in Wis. Admin. Code chs. NR 700 to NR 799.
- 5) The 128<sup>th</sup> Air Refueling Wing is responsible for obtaining any local, federal, or other applicable state permits to carry out the project.

All remediation sites are included in DNR's BRRTS database. All documents and project milestones related to the cleanup of each of the involved sites are listed in the database entry identified by BRRTS activity #(s) 02-41-

582725. Actions relating only to the management of contaminated material are tracked in the BRRTS system under activity # 02-41-582725.

We appreciate your efforts to protect the environment at this site. If you have any questions regarding this approval decision, please contact me, the DNR Project Manager, by calling (414) 750-7030, or by email at [riley.neumann@wisconsin.gov](mailto:riley.neumann@wisconsin.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Riley D. Neumann".

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