



January 12, 2024

Wisconsin Air National Guard  
c/o Capt. Brian Schrader  
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 Capt. Schrader:

On October 6, 2023, Nova Group submitted a soil management approval request document on behalf of the Wisconsin Air National Guard requesting to manage up to 1,550 cubic yards of 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 December 12, 2023, and January 9, 2024. 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).

The 128<sup>th</sup> Air Refueling Wing is constructing a new petroleum, oil, and lubricant (POL) area, which includes new fuel storage tanks, underground fuel piping, hydrant stands, electrical duct bank, a pumphouse, and covered parking. This new POL area is being constructed in a location southwest of the current POL area. Excavations for these areas will result in most soil being taken off-site for landfill disposal, but up to 1,550 cubic yards will be generated and managed on-site. Contaminated soil is impacted by per- and polyfluoroalkyl substances (PFAS). The excavated material will be placed next to the excavations and returned to the same locations once ready for backfilling. The managed soils will be placed beneath an asphalt or concrete surface or a minimum of one foot of clean soil, topsoil and seeded. 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 excavation/cap map (attached) of the soil management approval request will meet the locational criteria listed under Wis. Admin. Code § NR 718.12 (1) (c), exception for the following:

- Within 3 feet of the high groundwater level.

#### **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 locations and order, 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, from areas most likely to contain residual contamination. Based on an estimated volume of up to 1,550 cubic yards of material, 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 18 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 soil management approval request. 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,



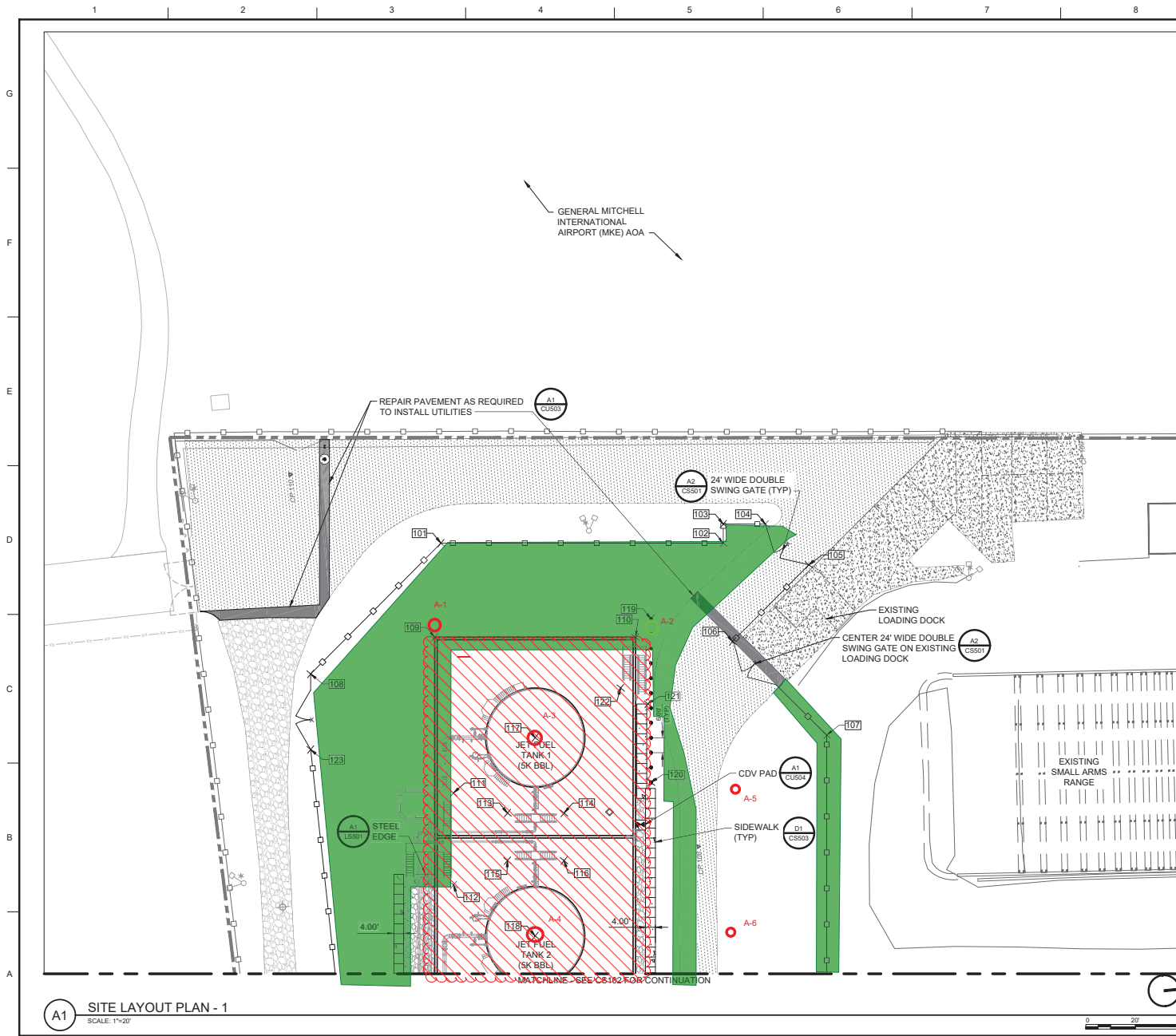
Riley D. Neumann  
Hydrogeologist/Project Manager  
Remediation & Redevelopment Program

Attachments:

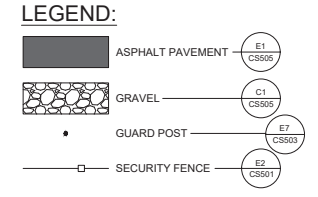
- Excavation/Cap Map
- Cap Maintenance Plan

cc:

- Mike Shrum, Nova Group
- James Dugger, Nova Group



- NOTES:**
- SEE SHEET CS100 FOR GENERAL SITE NOTES.
  - SEE SHEET CS110 FOR COORDINATE POINTS TABLE.
  - SEE SHEET CG101 AND CG110 FOR ADDITIONAL SITE LAYOUT AND COORDINATE INFORMATION.
  - FOR SECURITY FENCE AND GATES LOCATED IN EXISTING PAVED AREA, CONTRACTOR SHALL CORE DRILL INTO EXISTING PAVEMENT SECTION AS REQUIRED FOR FENCE AND GATE FOUNDATIONS.
  - SEE SHEET CS111 FOR ELECTRICAL STRUCTURE LOCATION PLAN.



**Boring Locations**

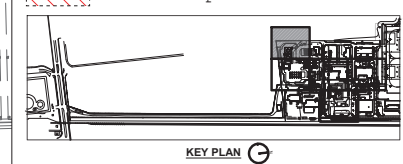
**Monitoring Wells**

**Grass**

**Electrical (Red Lines)**  
**Fuel (Orange Lines)**

concrete impervious surface

area to be excavated dirt removed



**US Army Corps of Engineers - Omaha District**

ISSUE DATE	01/17/2022
ISSUED BY	J. SCHNEIDER
DESIGNED BY	J. SCHNEIDER
PROJECT NO.	W0187-22-R-008
CONTRACT NO.	S. MCARDIAN
FILE NO.	22-187-101
DATE	1/17/2022
MARK	DESCRIPTION
0	

U.S. ARMY CORPS OF ENGINEERS  
 OMAHA DISTRICT  
 1816 CAPITOL AVE, OMAHA, NE 68102

DESIGNED BY: J. SCHNEIDER  
 PROJECT NO.: W0187-22-R-008  
 CONTRACT NO.: S. MCARDIAN  
 FILE NO.: 22-187-101  
 DATE: 1/17/2022

U.S. ARMY CORPS OF ENGINEERS  
 OMAHA DISTRICT  
 1816 CAPITOL AVE, OMAHA, NE 68102

DESIGNED BY: J. SCHNEIDER  
 PROJECT NO.: W0187-22-R-008  
 CONTRACT NO.: S. MCARDIAN  
 FILE NO.: 22-187-101  
 DATE: 1/17/2022

GENERAL MITCHELL FACILITIES REPLACEMENT  
 GENERAL MITCHELL IAP, WI

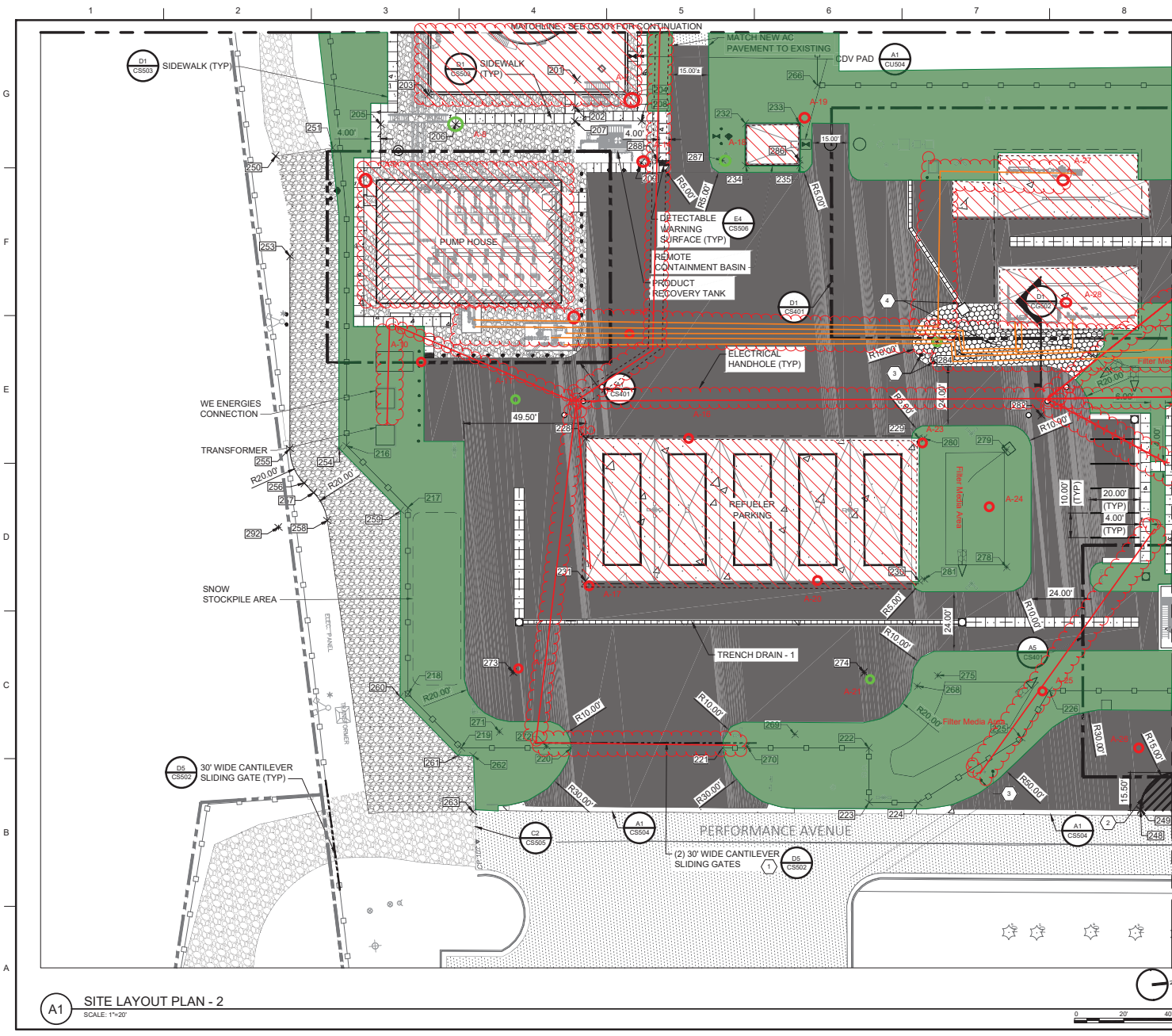
SITE LAYOUT PLAN - 1

SHEET ID  
**CS101**

STEPHEN J. McLAUGHLIN  
 E-48490  
 Civil Engineer  
 IL  
 01/17/2022

**A1** SITE LAYOUT PLAN - 1  
 SCALE: 1"=20'





**NOTES:**

1. SEE SHEET CS100 FOR GENERAL SITE NOTES.
2. SEE SHEET CS110 FOR COORDINATE POINTS TABLE.
3. SEE SHEET CG102 AND CG110 FOR ADDITIONAL SITE LAYOUT AND COORDINATE INFORMATION.
4. SEE SHEET CS111 FOR ELECTRICAL STRUCTURE LOCATION PLAN.

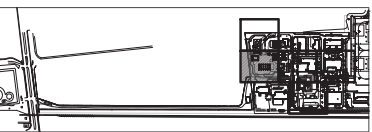
**LEGEND:**

	ASPHALT PAVEMENT	E1 CS506
	RIPRAP	A1 CG502 E1 CG502
	GRAVEL	C1 CS505
	VALLEY GUTTER	A1 CS503
	GUARD POST	E7 CS503
	SECURITY FENCE	E2 CS501
	TRENCH DRAIN	D1 CU506
	CURB AND GUTTER	C7 CS504

**KEYED NOTES:**

1. DUAL CANTILEVER SLIDING GATES TO BE CONSTRUCTED WITH LOCKABLE LATCH WHERE GATES MEET AT CENTER OF ROADWAY.
2. STRIPING AT MSS SHALL BE 4" WIDE YELLOW PAVEMENT MARKINGS. MARKINGS SHALL BE ANGLED AT 45° TO MSS AND SPACED AT 24".
3. INSTALL TWO (2) GUARD POSTS AT EPDS BUTTON LOCATION. LOCATE GUARD POSTS TO FACE ROAD. GUARD POSTS SHALL BE SPACED AT 4' ON CENTER AND 2' FROM EPDS BUTTON.
4. INSTALL RIPRAP LINED V-DITCH PER DETAIL D1 ON CG502. SEE SHEETS CG102 AND CG401 FOR GRADING INFORMATION.

concrete impervious surface  
 area to be excavated/trench



MARK	DESCRIPTION	DATE
0		01/17/2022

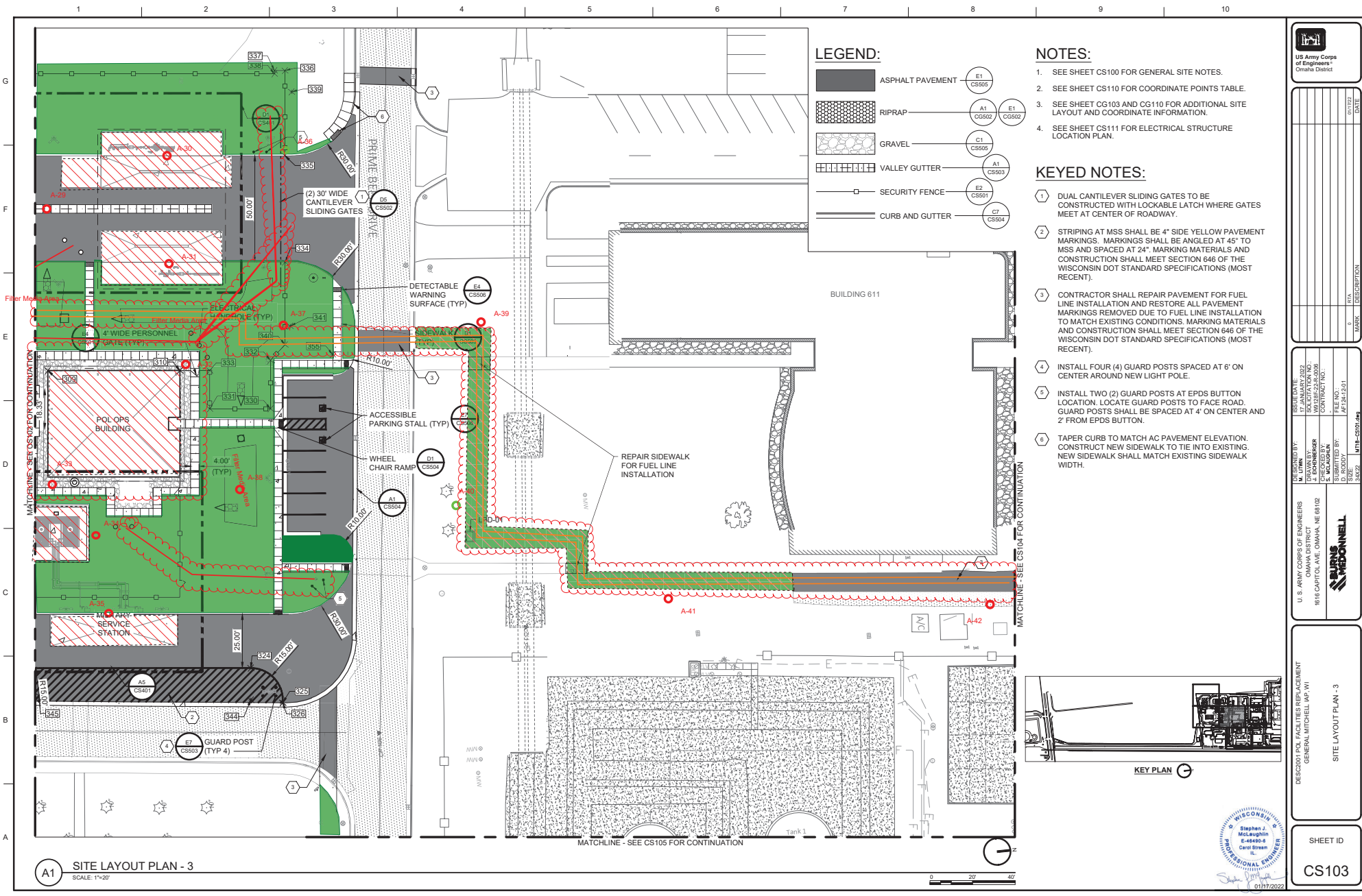
ISSUE DATE:	01/17/2022
DESIGNED BY:	S. J. McLaughlin
DRAWN BY:	J. Schreiber
CHECKED BY:	S. McLaughlin
CONTRACT NO.:	W91DF2-22-R-008
FILE NO.:	22-P&I-101
SCALE:	AS SHOWN
DATE:	01/17/2022

U.S. ARMY CORPS OF ENGINEERS  
 OMAHA DISTRICT  
 1816 CAPITOL AVE, OMAHA, NE 68102

68SC2001 POL FACILITIES REPLACEMENT  
 GENERAL MITCHELL IAP, WI

SITE LAYOUT PLAN - 2  
 SHEET ID  
**CS102**





**LEGEND:**

- ASPHALT PAVEMENT (E1 CS505)
- RIPRAP (A1 CS602, E1 CS602)
- GRAVEL (C1 CS505)
- VALLEY GUTTER (A1 CS503)
- SECURITY FENCE (E2 CS501)
- CURB AND GUTTER (C7 CS504)

**NOTES:**

1. SEE SHEET CS100 FOR GENERAL SITE NOTES.
2. SEE SHEET CS110 FOR COORDINATE POINTS TABLE.
3. SEE SHEET CG103 AND CG110 FOR ADDITIONAL SITE LAYOUT AND COORDINATE INFORMATION.
4. SEE SHEET CS111 FOR ELECTRICAL STRUCTURE LOCATION PLAN.

**KEYED NOTES:**

1. DUAL CANTILEVER SLIDING GATES TO BE CONSTRUCTED WITH LOCKABLE LATCH WHERE GATES MEET AT CENTER OF ROADWAY.
2. STRIPING AT MSS SHALL BE 4" SIDE YELLOW PAVEMENT MARKINGS. MARKINGS SHALL BE ANGLED AT 45° TO MSS AND SPACED AT 24". MARKING MATERIALS AND CONSTRUCTION SHALL MEET SECTION 646 OF THE WISCONSIN DOT STANDARD SPECIFICATIONS (MOST RECENT).
3. CONTRACTOR SHALL REPAIR PAVEMENT FOR FUEL LINE INSTALLATION AND RESTORE ALL PAVEMENT MARKINGS REMOVED DUE TO FUEL LINE INSTALLATION TO MATCH EXISTING CONDITIONS. MARKING MATERIALS AND CONSTRUCTION SHALL MEET SECTION 646 OF THE WISCONSIN DOT STANDARD SPECIFICATIONS (MOST RECENT).
4. INSTALL FOUR (4) GUARD POSTS SPACED AT 6' ON CENTER AROUND NEW LIGHT POLE.
5. INSTALL TWO (2) GUARD POSTS AT EPDS BUTTON LOCATION. LOCATE GUARD POSTS TO FACE ROAD. GUARD POSTS SHALL BE SPACED AT 4' ON CENTER AND 2' FROM EPDS BUTTON.
6. TAPER CURB TO MATCH AC PAVEMENT ELEVATION. CONSTRUCT NEW SIDEWALK TO TIE INTO EXISTING. NEW SIDEWALK SHALL MATCH EXISTING SIDEWALK WIDTH.

**A1 SITE LAYOUT PLAN - 3**  
SCALE: 1"=20'



MARK	DATE	DESCRIPTION
0	01/17/2022	

ISSUE DATE:	01/17/2022
ISSUED BY:	S. J. McLaughlin
DESIGNED BY:	J. Schreiber
CHECKED BY:	S. McLaughlin
CONTRACT NO.:	W01B87-22-R-008
FILE NO.:	22-151-101
DATE:	01/17/2022
SCALE:	1"=20'
DATE:	01/17/2022

DESIGNED BY:  
U.S. ARMY CORPS OF ENGINEERS  
OMAHA DISTRICT  
1816 CAPITOL AVE. OMAHA, NE 68102

PREPARED BY:  
S. J. McLaughlin  
S. J. McLaughlin

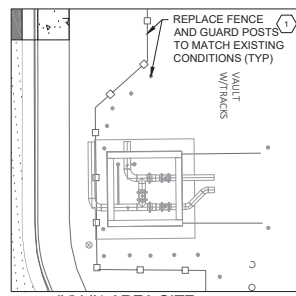
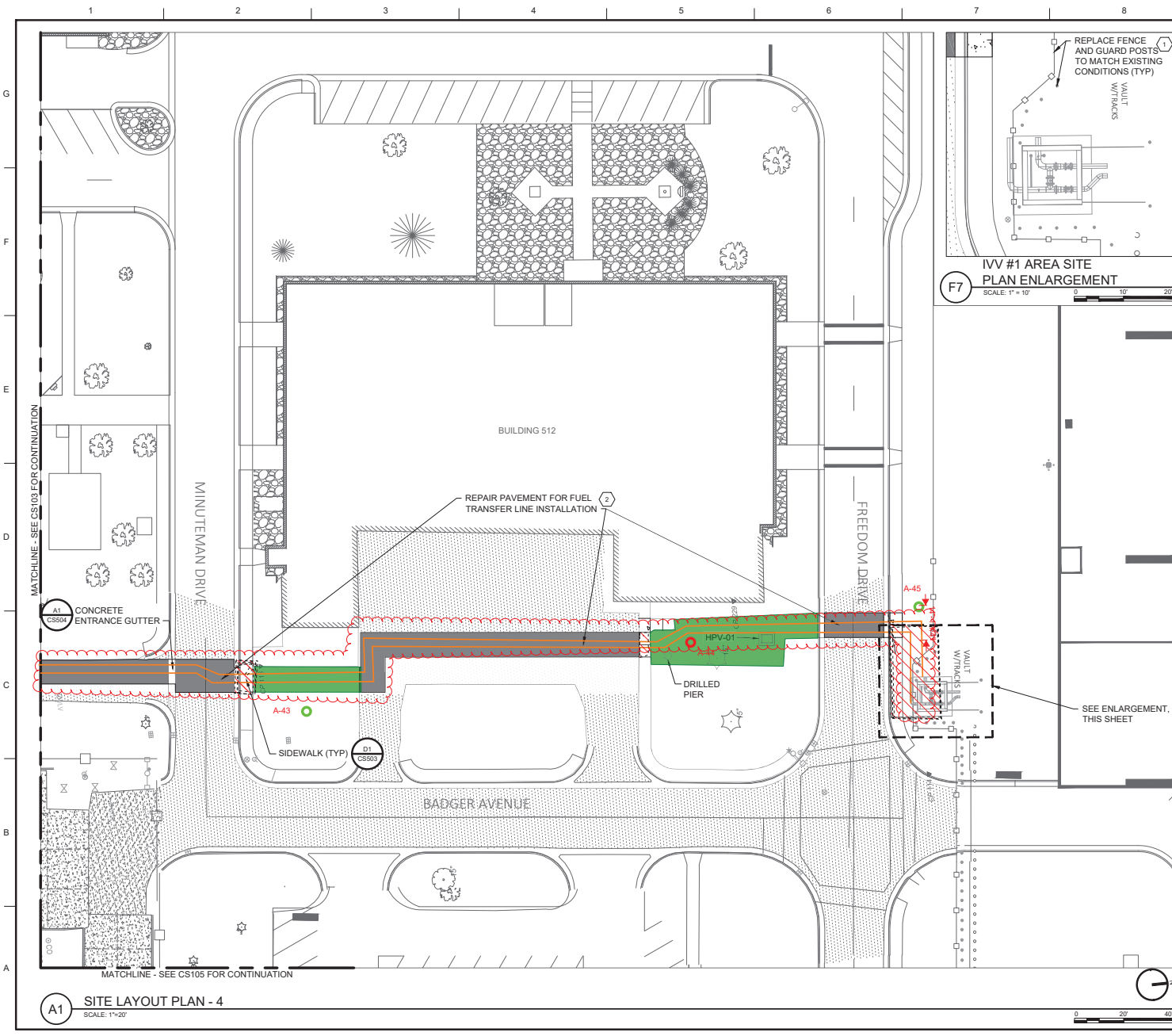
DATE:  
01/17/2022

PROJECT: POL FACILITIES RE-ACQUISITION  
GENERAL MITCHELL IAP, WI

SITE LAYOUT PLAN - 3

SHEET ID  
**CS103**

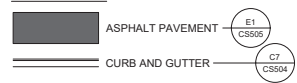




**NOTES:**

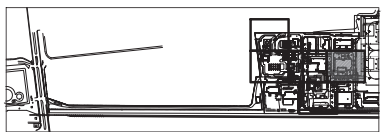
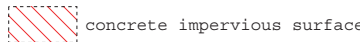
- SEE SHEET CS100 FOR GENERAL SITE NOTES.
- SEE SHEET CS110 FOR COORDINATE POINTS TABLE.
- SEE SHEET CG103 AND CG110 FOR ADDITIONAL SITE LAYOUT AND COORDINATE INFORMATION.

**LEGEND:**



**KEYED NOTES:**

- TEMPORARILY RELOCATE AOA FENCE INTO AOA TO BRING ISOLATION VALVE VAULT CONSTRUCTION AREA OUTSIDE OF AOA. COORDINATE WITH GOVERNMENT ON FINAL LOCATION OF TEMPORARY AOA FENCING.
- CONTRACTOR SHALL RESTORE ALL PAVEMENT MARKINGS REMOVED DUE TO FUEL LINE INSTALLATION TO MATCH EXISTING CONDITIONS. MARKING MATERIALS AND CONSTRUCTION SHALL MEET SECTION 646 OF THE WISCONSIN DOT STANDARD SPECIFICATIONS (MOST RECENT).



MARK	DESCRIPTION	DATE
0		01/17/2022

ISSUED DATE:	12/15/2021
SCALE:	AS SHOWN
PROJECT NO.:	W0187-22-R-008
CONTRACT NO.:	
FILE NO.:	22-181-101
DATE:	12/15/2021
SCALE:	AS SHOWN

DESIGNED BY:  
 U.S. ARMY CORPS OF ENGINEERS  
 OMAHA DISTRICT  
 1816 CAPITOL AVE, OMAHA, NE 68102

PREPARED BY:  
 J. SCHNEIDER  
 S. MCARDIAN

SUBMITTED BY:  
 S. MCARDIAN

DATE:  
 12/15/2021

SCALE:  
 AS SHOWN

DATE:  
 12/15/2021

6852001 POL. FACILITIES REPLACEMENT  
 GENERAL MITCHELL IAP, WI

SITE LAYOUT PLAN - 4

SHEET ID  
**CS104**









## NOVA GROUP CONTRACT MITCHELL AIRPORT HYDRANT FUEL REPLACEMENT

21 August 2023

MEMORANDUM FOR WISCONSIN DEPARTMENT OF NATURAL RESOURCES

FROM: Mike Shrum  
Nova Group  
185 Devlin Road  
Napa CA, 94558

SUBJECT: Cover Maintenance Plan

1. This document is the Cover Maintenance Plan in accordance with NR 724.13(2), Wis. Adm. Code for the Fuel Hydrant Replacement Project located at 1919 East Grange Avenue, Milwaukee, Wisconsin. The property is located in the NW ¼ Section 34 Township 6N, Range 22 East, Milwaukee County, Wisconsin. The maintenance activities relate to the cover which addresses or occupies the areas over the Perfluorinated Compounds (PFAS) contaminated groundwater or soils.

2. **Description of Contamination** – Soil contaminated by PFAS is located at numerous possible release locations (PRLs) across the installation. Soil borings were done and samples taken at ranges from 0-15 feet below grade surface. Groundwater samples were taken from temporary monitoring wells from 0-15 feet below grade surface as part of the Site Inspection and found to be contaminated with PFAS. Results of samples can be found in the FY16 Phase 1 Regional Site Inspections for Perfluorinated Compounds report and the samples taken by KPH Environmental in May 2023(see attached reports).

3. **Description of Cover to be Maintained** – Soil from construction activities will fall into two types of cover to be maintained. See attached map for cover locations.

- Contaminated soils will be placed under an impervious surface. Impervious surface would either be asphalt pavement system consisting typically of four inches of asphalt with a twelve inch compacted gravel base or a eight inch concrete pavement with a nine inch compacted gravel base.
- A small percentage of Contaminated soils will be placed back in the original excavation. Contaminated soils will be covered by minimum of one foot of clean soils, top soil, and seeded.

4. **Cover Purpose** – The cover over the contaminated soil serves as a barrier to prevent direct human contact with residual soil contamination that might otherwise pose a threat to human health. Additionally, the cover minimizes future soil to groundwater contamination for PFAS. Based on the current use of the property, industrial, the barrier should function as intended unless disturbed.

5. **Annual Inspection** – The cover overlying the contaminated soil and as depicted in the attached map will be inspected once a year, normally in the spring after all the snow and ice is gone, for deterioration, cracks, and other potential problems that can cause exposure to underlying soils. The inspections will be performed by the property owner or their designated representative. The inspections will be performed to evaluate damage due to settling, exposure to the weather, wear from traffic, increasing age and other factors. Any area where soils have become or are likely to be come exposed will be documented. Inspections will be documented on Form 4400-305 and will include pictures showing current state each year.

6. **Maintenance Activities** – If problems are noted during the annual inspections or at any other time during the year, repairs will be scheduled as soon as practical. Repairs can include patching, filling, resurfacing, or construction operations. In the event that necessary maintenance activities expose the underlying soil, the owner must inform maintenance workers of the direct contact exposure hazard and provide them with appropriate personal

protection equipment (PPE). The owner must sample any soil that is excavated from the site prior to disposal to ascertain if contamination remains. The soil must be treated, stored, and disposed of by the owner in accordance with applicable local, state, and federal law.

In the event the cover overluing the contaminated soil is removed, or replaced, the replacement cover must be equal to cover that was removed. Any replacement barrier will be subject to the same maintenance and inspection guidelines as outlined in this Maintenance Plan unless indicated otherwise by the DNR or it successor.

The property owner, in order to maintain the integrity of the cover, will maintain a copy of this maintenance plan in the Civil Engineer Squadron, Environmental Section and make it available to all interested parties for viewing.

**7. Prohibition of Activities and Notification of DNR Prior to Actions Affecting a Cover** – The following activities are prohibited on any portion of the property where a covier is required as shown on the attached map, unless written approval has been obtained from the Wisconsin Department of Natural Resources; 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; 6) construction or placement of a building or other structure; or 7) changing the use or occupacncy of the property to residential exposure setting, such as a residence, school, day care, senior center, hospital, or similar residential exposure setting.

If removal, replacement, or other changes to a cover are considered, the property owner will contact the DNR at least 45 days before taking such action, to determine further action may be necessary to protect human health, safety, welfare, or the environment, in accordance with s. NR 727.07, Wis. Adm. Code.

**8. Amendment or Withdrawl of Maintenance Plan** – This maintenance plan can be amended or withdrawn by the property owner and it successors with the written approval of Wisconsin Department of Natural Resources.

**9. Contact Information** –

Site Owner and Operator– Wisconsin Air National Guard  
1919 East Grange Avenue  
Milwaukee, WI 53207  
414-944-8414

10. If you have any additional questions, please feel free to contact me at 707-204-8584 or [mike.shrum@novagr.com](mailto:mike.shrum@novagr.com) at any time. Thank you in advance for your review of this plan.

Attachment:

1. Cover Map