



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 128TH AIR REFUELING WING (ANG)**

5 April 2024

MEMORANDUM FOR WISCONSIN DEPARTMENT OF NATURAL RESOURCES

FROM: 128 CES/CEIE  
1919 E Grange Ave  
Milwaukee WI 53207-6142

SUBJECT: Cover Maintenance Plan – BRRTS # 02-41-582725

1. This document is the Cover Maintenance Plan in accordance with NR 724.13(2), Wis. Adm. Code for the 128<sup>th</sup> Air Refueling Wing located at 1919 East Grange Avenue, Milwaukee, Wisconsin. The property is located in the NW ¼ Section 34 Township 6 North, Range 22 East, Milwaukee County, Wisconsin. The maintenance activities relate to the cover which addresses or occupies the areas over the Perflourinated 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 Perflourinated Compounds report.

3. **Description of Cover to be Maintained** – Soil from construction activities will fall into one type of cover to be maintained.

- Contaminated soils will be placed into a berm and covered with one (1) foot of clean soil. Berm will then be seeded and maintained by regular mowing activities.

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 parites 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  
414-944-8277

10. If you have any additional questions, please feel free to contact me at 414-944-8414 or brian.schrader.1@us.af.mil.

BRIAN J. SCHRADER, Capt, WIANG  
Environmental Scientist




Attachment:

1. Berm Location Map

128th AIR REFUELING WING  
MILWAUKEE, WISCONSIN



**Legend**

-  Wetland\_A
-  Offset
-  Relocated Soils

