



April 25, 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 April 10, 2024, you submitted an approval request document requesting to manage 450 cubic yards of contaminated soil on the same site from which it was excavated in accordance with Wis. Admin. Code § NR 718.12.

Soil was removed during oil water separator projects at buildings 208 and 304 and is currently stockpiled on-site. The oil water separator projects generated approximately 450 cubic yards of contaminated soil impacted with polycyclic aromatic hydrocarbons, metals, and per- and polyfluoroalkyl substances. This soil will be relocated to a berm south of building 621. The berm will be covered with one foot of clean soil and grass seed and will be maintained by the 128<sup>th</sup> Air Refueling Wing in accordance with the 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 attached figure will meet the locational criteria listed under Wis. Admin. Code § NR 718.12 (1) (c), exception for the following:

- Within 100 feet of a wetland or critical habitat area

#### **Grant of exemption to Wis. Admin. Code § NR 718.12 (1) (c) 2**

In consideration of site conditions and the proposed capping of the berm, the DNR grants an exemption to the location criteria of Wis. Admin. Code § 718.12 (1) (c) 2 and will allow placement of contaminated soil material within 100 feet of a wetland.

#### **Characterization of Excavated Soil**

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, and metals from areas most likely to contain residual contamination. Based on an estimated volume of 450 cubic yards of material, and a sampling frequency of eight 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 the next 3 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) Wisconsin Air National Guard 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.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Riley Neumann", with a long horizontal flourish extending to the right.

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

Attachments:

- Cover Maintenance
- Berm Figure



**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](mailto: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

