



March 14, 2019

Ms. Kay Grosinske
AFCEC/CIBE
2261 Hughes Avenue, Suite 163
Joint Base San Antonio - Lackland, TX 78236-9853

Subject: Reported PFAS Contamination
Former Air Reserve Station, General Mitchell International Airport, Milwaukee, WI
BRRTS #: 02-41-583232, FID#: 241176980

Dear Ms. Grosinske:

On December 21, 2018, the Wisconsin Department of Natural Resources (DNR) received a draft report titled *Site Inspection Report for Aqueous Film Forming Foam Areas* (Report), dated November 2018. The Report was prepared on Air Force Civil Engineer Center's (AFCEC) behalf by their consultant, Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec). A review and comments on the Report were requested by Amec and AFCEC.

The Report confirms the presence of Per- and Polyfluorinated Alkyl Substances (PFAS) at the former Air Reserve Station within the sampled media (soil, groundwater, surface water, and sediment).

Based on the information that has been submitted to the DNR regarding this site, we believe you are responsible for investigating and restoring the environment at the above-described site under Wis. Stats. § 292.11, known as the hazardous substances spill law.

This letter describes the legal responsibilities of a person who is responsible under Wis. Stats. § 292.11, explains what you need to do to investigate and clean up the contamination, and provides you with information about cleanups, environmental consultants, and working cooperatively with the DNR.

Legal Responsibilities:

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Wis. Stats. § 292.11 (3), states:

- **RESPONSIBILITY.** A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wis. Admin. Code chs. NR 700 through NR 754 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Wis. Admin. Code ch. NR 140 establishes groundwater standards for contaminants that reach groundwater.

United States Environmental Protection Agency (EPA) maximum contaminant levels (MCLs) and Wis. Admin. Code ch. NR 140 groundwater quality standards have not been established for PFAS compounds; however, the EPA currently has a cumulative Health Advisory Level (HAL) of 70 parts per trillion (ppt) for two of the most

prevalent PFAS detected in drinking water. Persons responsible for the discharge of PFAS to the environment will need to determine appropriate standards for remedial action per Wis. Admin. Code ch. 722. DNR has authority to require that the responsible party develop a site-specific cleanup standard for contaminated environmental media in accordance with Wis. Admin. Code § NR 722.09.

Steps to Take:

The longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. The following information provides the required steps to take. Unless otherwise approved by DNR in writing you must complete the work by the timeframes specified.

1. As soon as practicable, you should submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. If you do not take action, the DNR may initiate enforcement action against you.
2. Wis. Admin. Code § NR 700.11(1)(bm) requires that within 60 days, you must submit a work plan for completing investigations at each of the sites listed above. The work plan must comply with the requirements in the NR 700 Wis. Adm. Code rule series and should adhere to current DNR technical guidance documents.
3. You must initiate the site investigation within 90 days of submitting the site investigation work plan. You may proceed with the field investigation upon DNR notification to proceed. If the DNR has not responded within 30 days from submittal of the work plan, you are required to proceed with the field investigation. If a fee for DNR review has been submitted, the field investigation must begin within 60 days after receiving DNR approval.
4. Within 60 days after completion of the field investigation and receipt of the laboratory data, you must submit a Site Investigation Report to the DNR or other agency with administrative authority.
5. Within 60 days after submitting the Site Investigation Report, you must submit a remedial actions options report (RAOR). The RAOR shall include an evaluation of Green and Sustainable Remediation opportunities as required by Wis. Admin. Code § NR 722.09 (2m).

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System (BRRTS), a version of which appears on the DNR's internet site. You may view the information related to your site at any time (<http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>) and use the feedback system to alert us to any errors in the data.

Please be aware that the timeframes specified above are required by rule, and you must complete the site investigation and cleanup to maintain your compliance with the spills law and chapters NR 700 through NR754. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

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If you have any questions, contact me, the DNR Project Manager, at (414) 263-8699 or via email at riley.neumann@wisconsin.gov.

Sincerely,

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

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

cc: Mr. Andrew Smith, Amec Foster Wheeler Environment & Infrastructure, Inc. (electronic)
Ms. Sarah Schneider, Amec Foster Wheeler Environment & Infrastructure, Inc. (electronic)
Ms. Judy Fassbender, Wisconsin Department of Natural Resources (electronic)