



March 14, 2019

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

Subject: Review of *Draft Site Inspection Report for Aqueous Film Forming Foam Areas*
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). DNR has completed our review of the Report and this letter summarizes our comments.

Background

The former Air Reserve Station (ARS) occupies approximately 101 acres in the southwest portion of the General Mitchell International Airport (GMIA) property. The installation was constructed in the early 1950s, and several Air Force Wings occupied the space until the ARS was closed on February 2, 2008. Currently, the former ARS is home to Milwaukee County's MKE Regional Business Park, which leases hangar and office space in support of GMIA and other customers.

The United States Air Force (USAF) is conducting site inspections for Per- and Polyfluoroalkyl Substances (PFAS) at Base Realignment and Closure installations. The site inspections are in response to the use and storage of aqueous film forming foam (AFFF). AFFF was used for firefighting activities at the former ARS. A site investigation was conducted in summer 2015 to evaluate the presence of PFAS near the fire training pit. Additionally, a preliminary site assessment identified eleven other potential release locations based on areas where AFFF was stored, handled, used, or released.

Based on the findings of the preliminary site assessment, a site inspection work plan was developed for the investigation of eight of the eleven proposed potential release locations. The *Draft Installation-Specific Work Plan*, dated October 2016, was received by the DNR in March 2017. The Report documents the investigation results of the work plan, including the results of the site investigation of the fire training pit.

Report Summary

The Report details the investigation at eight potential release locations at the former ARS. The objectives of the site inspection were as follows: 1) determine if perfluorooctane sulfonic acid (PFOS), perfluorooctanoic acid (PFOA), or perfluorobutane sulfonate (PFBS) are present in groundwater, soil, surface water, or sediment, 2) determine if concentrations of PFOS, PFOA, or the sum of both (PFOS+PFOA) in groundwater exceed the United States Environmental Protection Agency (USEPA) Health Advisory (HA) of 0.07 µg/L and if concentrations of

PFBS in groundwater exceed the USEPA Tap Water Regional Screening Level (RSL) of 400 µg/L, 3) determine if concentrations of PFOS or PFOA in soil exceed the USAF calculated screening level and DNR residual contaminant level (RCL) of 1.26 mg/kg, and if concentrations of PFBS in soil exceed the USEPA residential RSL of 1,300 mg/kg or the DNR RCL of 1,260 mg/kg, 4) determine if concentrations of PFOS or PFOA in sediment exceed the USAF calculated screening level of 1.26 mg/kg and, 5) identify potential human health pathways and receptors and, if necessary, mitigate impacts to drinking water greater than the HA that are attributable to the Air Force.

The Report focuses on PFOS, PFOA, and PFBS. Other PFAS were included within the lab analysis. These other PFAS include, but are not limited to, perfluoroheptanoic acid (PFHpA), perfluorohexanesulfonic acid (PFHxS), and perfluorononanoic acid (PFNA). No standards or screening levels were proposed for these other compounds.

Amec performed site inspection activities at the former ARS, which included soil, groundwater, surface water, and sediment sampling. Based on the findings of the investigations, Amec concludes that project screening levels were not exceeded at all of the investigated areas, with the exception of the former fire training pit, which exhibited exceedances of the HA in groundwater. An investigation of five downgradient private drinking water wells was conducted to determine if drinking water was a receptor of concern. The results of this investigation indicate that PFAS was not detected above the reported limits of detection in any of the five sampled wells.

DNR Comments

The DNR has reviewed the Report in terms of Wis. Admin. Code ch. 716, which defines site investigation requirements after a discharge to the environment has occurred. The DNR provides the following comments:

- Wisconsin law requires the responsible party to define the degree and extent of contamination in all affected media. DNR interpretation of the Report indicates that additional investigation is necessary to fulfill this requirement, as the extent of impacts has not been delineated.
- In the next phase of the investigation of degree and extent of contamination in all affected media, evaluate how off-site impacts, including, but not limited to, an assessment of the nearby tributary to Oak Creek and downgradient locations, including surface water and sediment.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (414) 263-8699, or by email at Riley.Neumann@wisconsin.gov.

Sincerely,



Riley D. Neumann
Hydrogeologist
Remediation & Redevelopment Program

cc: Mr. Andrew Smith, Amec Foster Wheeler Environment & Infrastructure, Inc. (electronic)
Ms. Sarah Schneider, Amec Foster Wheeler Environment & Infrastructure, Inc. (electronic)
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