



March 22, 2024

Brian Dranzik
General Mitchell International Airport
5300 S. Howell Avenue
Milwaukee, WI 53207
Sent Via Email Only to bdranzik@mitchellairport.com

Jack Rabenn
Crow Holdings Industrial
318 N. Carpenter Street, Suite 250
Chicago, IL 60607
Sent Via Email Only to jrabenn@crowholdings.com

Subject: Approval to Manage Contaminated Soil under Wis. Admin. Code § NR 718.12 on Site
Air Reserve Station (Former 440th) – PFAS, 300 E. College Ave., Milwaukee, WI
DNR BRRTS Activity #: 02-41-583232, FID #: 241176980

Dear Mr. Dranzik and Mr. Rabenn:

On January 18, 2024, The Sigma Group, Inc. submitted an approval request document on your behalf requesting to manage approximately 200,000 cubic yards of contaminated soil on the same site from which it will be excavated in accordance with Wis. Admin. Code § NR 718.12. 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 proposed redevelopment includes demolition of existing structures and construction of a 337,400 square foot warehouse/cargo facility. Total soil disturbance for the project is estimated to generate approximately 200,000 cubic yards of contaminated soil. The contaminated material is impacted with per- and polyfluoroalkyl substances (PFAS), polycyclic aromatic hydrocarbons (PAHs), metals, polychlorinated biphenyls (PCBs), and volatile organic compounds (VOCs). An approval through Wis. Admin. Code § NR 718.12 has been requested to manage the contaminated soil across the redevelopment area to bring the site up to grade prior to construction of the new facility and to construct soil berms in several locations containing excess contaminated soil.

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 Figure 15 and Figure 18 of the approval request document 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 the redevelopment plans and the nonfederal wetland exemption determination from the DNR Water Management Specialist, 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 any wetland or critical habitat area.

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 PFAS, PAHs, PCBs, metals, and VOCs from areas most likely to contain residual contamination. Based on an estimated volume of 200,000 cubic yards of material, with approximately 500 discrete samples collected, the sampling protocol described in Wis. Admin. Code § NR 718.12 (1) (e) was not met. However, the DNR has determined that the material was adequately characterized due to the generally consistent concentrations of contaminants detected across the site.

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 Air Reserve Station (Former 440th) 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.

Vapor Intrusion Sampling

Due to the elevated concentration of benzene in groundwater beneath the proposed facility, post-construction vapor sampling is required as a contingency of this materials management plan approval. A sampling plan should be provided for DNR review once construction is complete.

Exempt Soil Determination

The DNR does not concur with the proposal to reuse soil in the area of Building 205 as exempt soil. The redevelopment area has been identified as PFAS-impacted, and further the sampling frequency for the volume of soil proposed to be managed has not been met. The soil in this area can be used as backfill or grading material so long as it is placed under an impervious cap or the minimum of 12 inches of clean soil cap. The soil should not be taken off-site as clean material or used as capping material on-site. If you wish to reuse this soil as clean, exempt soil, you will need to verify and meet the requirements of Wis. Admin. Code ch. NR 718.

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 2 years. 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 Air Reserve Station (Former 440th).
 - 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 Air Reserve Station (Former 440th).
- 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 Air Reserve Station (Former 440th), 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) Crow Holdings Industrial 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) 02-41-583232.

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

Sincerely,

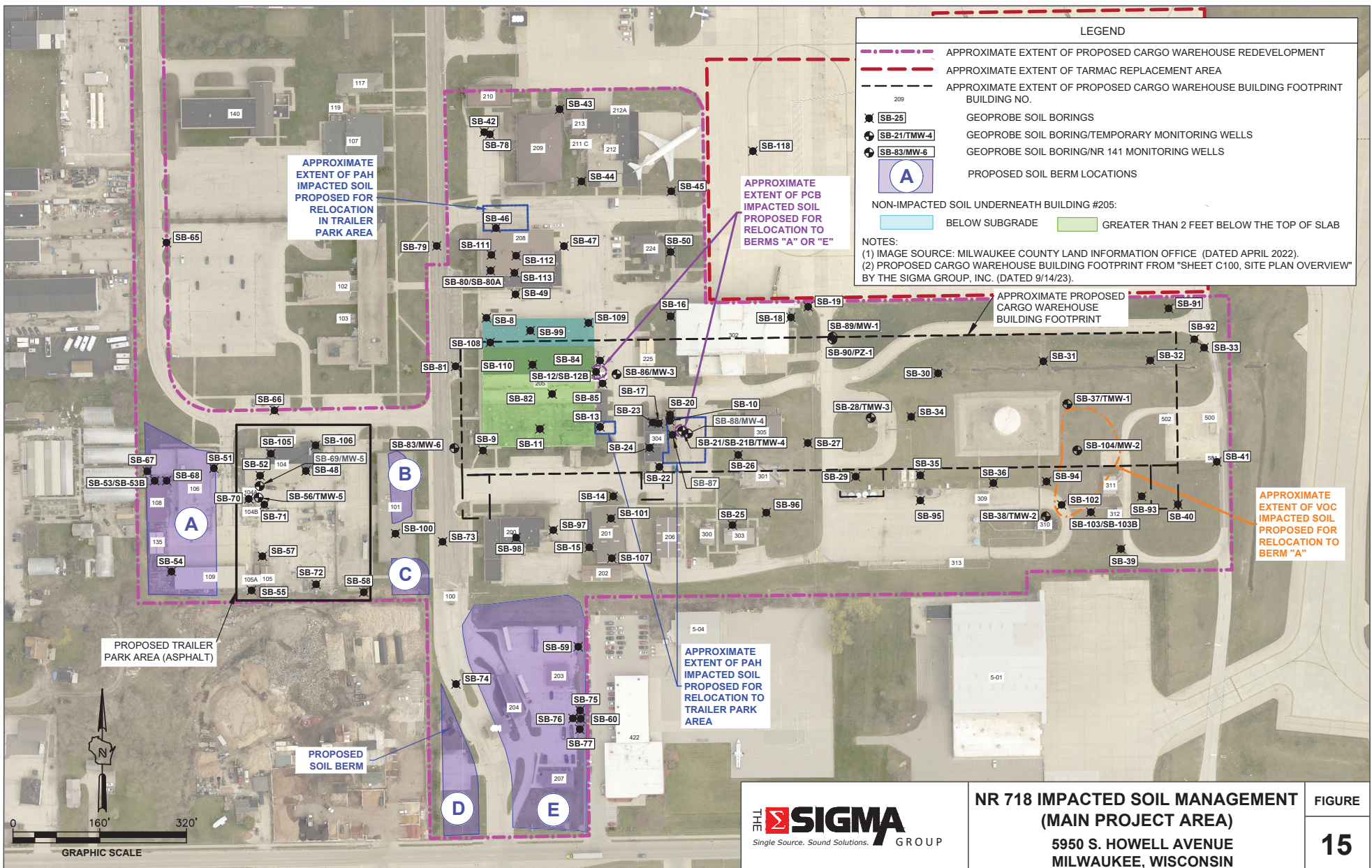


Hydrogeologist/Project Manager
Remediation & Redevelopment Program

Attachments: Figure 15, NR 718 Impacted Soil Management (Main Project Area)
Figure 18, Conceptual Grading Plan (Main Project Area)

cc: Kristin Kurzka, The Sigma Group, Inc. (electronic)
Chelsea Corson, The Sigma Group, Inc. (electronic)

PROJECT: 20758 | DIRECTORY: CAD | FILENAME: 20758_NR718_04-artc_Placement.dwg | CREATED BY: JRS | DATE: 11/2/2023



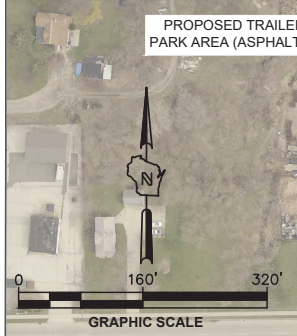
LEGEND

- APPROXIMATE EXTENT OF PROPOSED CARGO WAREHOUSE REDEVELOPMENT
- APPROXIMATE EXTENT OF TARMAC REPLACEMENT AREA
- APPROXIMATE EXTENT OF PROPOSED CARGO WAREHOUSE BUILDING FOOTPRINT BUILDING NO.
- SB-25 GEOPROBE SOIL BORINGS
- SB-21/TMW-4 GEOPROBE SOIL BORING/TEMPORARY MONITORING WELLS
- SB-83/MW-6 GEOPROBE SOIL BORING/NR 141 MONITORING WELLS
- A PROPOSED SOIL BERM LOCATIONS

NON-IMPACTED SOIL UNDERNEATH BUILDING #205:

- BELOW SUBGRADE
- GREATER THAN 2 FEET BELOW THE TOP OF SLAB

NOTES:
 (1) IMAGE SOURCE: MILWAUKEE COUNTY LAND INFORMATION OFFICE (DATED APRIL 2022).
 (2) PROPOSED CARGO WAREHOUSE BUILDING FOOTPRINT FROM "SHEET C100, SITE PLAN OVERVIEW" BY THE SIGMA GROUP, INC. (DATED 9/14/23).



**NR 718 IMPACTED SOIL MANAGEMENT
(MAIN PROJECT AREA)**
 5950 S. HOWELL AVENUE
 MILWAUKEE, WISCONSIN

FIGURE
15

Minimum Elevation	Maximum Elevation	Color Scheme
-19.00'	-16.00'	
-16.00'	-13.00'	
-13.00'	-10.00'	
-10.00'	-7.00'	
-7.00'	-4.00'	
-4.00'	-1.00'	
-1.00'	0.00'	
0.00'	1.00'	
1.00'	4.00'	
4.00'	7.00'	
7.00'	10.00'	
10.00'	13.00'	
13.00'	16.00'	
16.00'	19.00'	
19.00'	22.00'	
22.00'	25.00'	
25.00'	28.00'	
28.00'	31.00'	

LEGEND

- APPROXIMATE EXTENT OF PHASE I OF THE PROPOSED REDEVELOPMENT
- APPROXIMATE EXTENT OF TARMAC AREA OF THE PROPOSED REDEVELOPMENT
- BUILDING NO.
- APPROXIMATE EXTENT OF PROPOSED CARGO WAREHOUSE BUILDING FOOTPRINT
- SB-25 GEOPROBE SOIL BORINGS
- SB-21/TMW-4 GEOPROBE SOIL BORING/TEMPORARY MONITORING WELLS
- SB-83/MW-6 GEOPROBE SOIL BORING/NR 141 MONITORING WELLS

NOTES:
 1) BASEMAP SOURCE: WI - MKE AIRPORT - C3D 2023-09-20.DWG PREPARED BY ARCO MURRAY (DATED 9/20/2023).

