



November 18, 2019

Riley Neumann, Project Manager  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
2300 N. Martin Luther King Drive  
Milwaukee, WI 53212

Subject: Immediate Actions – NR 708.05  
Interim Actions – NR 708.11

Dear Mr. Neumann,

Per the Department of Natural Resources (DNR) October 17, 2019 letter to General Mitchell International Airport (GMIA) detailing *Reported Contamination & Responsibilities* pertaining to Per- and polyfluoroalkyl substance detected at GMIA the following responses are detailed to address the requirements of *Immediate Actions – NR 708.05 along with Interim Actions – NR 708.11*.

Immediate Actions – NR 708.05

- In 2012, GMIA switched to a Federal Aviation Administration (FAA) certified aqueous film-forming foam (AFFF) mandated firefighting material that does not contain the long-chain or C8 chemicals that are most often associated with possible health and environmental impacts. GMIA switched to a *shorter chain (C6)* PFAS firefighting foam that meets FAA mandated requirements.
- GMIA has discontinued all use of AFFF for onsite training. Onsite training using AFFF has been discontinued for several years now. The use of AFFF would only be applied for emergency purposes.
- In 2019 GMIA removed a 1,000- gallon underground storage tank (UST) containing AFFF located directly adjacent to the Fire House to ensure no leakage had occurred. The UST was completely intact with no evidence of leakage. All AFFF is currently stored in either 5 or 55-gallon containers in a covered storage facility located within the Fire House. Current storage is approximately 3,100 gallons.

- By law, the FAA requires annual AFFF- dispensing vehicles to test and calibrate equipment to FAA standards. Normally approximately 5-gallons per vehicle is required to be dispensed for these tests. GMIA is planning in 2020 to acquire new equipment to test and calibrate AFFF-dispensing vehicles without having any AFFF released to the environment. Presently these tests are conducted at a bentonite-lined firefighting training facility.
- GMIA issued a *Request for Proposals* on November 6, 2019 for the development of a *Scoping and Work Plan Submittal – NR 716.07 and 716.09 along with Field Investigation – NR 716.11* for inclusion within the *Site Investigation Report – NR 716.15*. Consultant selection is scheduled for no later than December 5, 2019. Anticipated project start is January 2020.

#### Interim Actions – 708.11

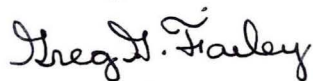
With the limited surface water analysis conducted to date by the US Geological Survey (USGS) it is very difficult to determine where PFAS contamination is present on GMIA property. Surface water analysis seems to indicate migration from the 128<sup>th</sup> Air Refueling Wing and the former 440<sup>th</sup> Air Reserve Station contributing to surface water concentrations noted by the USGS. Surface water concentrations of PFAS were elevated in the vicinity of these sites. However, during the *Field Investigation – NR 716.11* work phase GMIA shall:

- Test the soil and groundwater near its historic onsite firefighter training facility, Fire House and any other historical AFFF use areas.
- Develop an overall strategic environmental investigation plan.
- Coordinate and work with the other *potential responsible parties* (PRP's) on a more comprehensive understanding of PFAS contamination adjacent to and potentially within GMIA property.

With better data along with an understanding of migration pathways remedial actions can be properly developed.

GMIA is committed to proactively address this issue and has taken several steps to address this evolving issue while maintaining FAA -mandated firefighting requirements for overall air travel safety.

Sincerely,



Greg G. Failey  
Environmental Manager