



June 12, 2020

Mr. Greg Failey
Airport Environmental Manager
5300 S. Howell Ave.
Milwaukee, WI 53207

Subject: Review of *Site Investigation Work Plan*
General Mitchell International Airport PFAS, 5300 S. Howell Ave., Milwaukee, WI
BRRTS #: 02-41-584547, FID #: 241280270

Dear Mr. Failey:

On March 30, 2020, the Wisconsin Department of Natural Resources (DNR) received the *Site Investigation Work Plan* (SIWP) prepared on your behalf by your consultant, AECOM, for the property described above. On May 1, 2020, a technical assistance fee was received for DNR review and a written response.

Background

In October 1926, the Milwaukee County Board purchased the current airport land. Prior to 1926, the land was undeveloped. General Mitchell International Airport (GMIA) received its name in 1986 and has completed many expansions and renovations since the 1926 land purchase. Since around 1970, firefighting foams have been commonly employed by military and municipal fire departments. Per- and polyfluoroalkyl substances (PFAS) have been used in many aqueous film forming foams (AFFF) used by the military and at airports for their ability to extinguish petroleum-related fires. Historically, GMIA has used PFAS-containing firefighting foams per Federal Aviation Administration (FAA) requirements.

GMIA has a shared history with military aviation, including the 128th Air Refueling Wing, which has operated since 1947 on the East Ramp of the property, and the 440th Airlift Wing, which operated from the 1950s until 2008 at the South Ramp of the property. The 128th Air Refueling Wing and the former 440th Airlift Wing both have individual investigations for PFAS due to the historical use of firefighting foams at their respective bases.

GMIA was required by the DNR as part of a Wisconsin Pollution Discharge Elimination System process to conduct an initial survey of PFAS in surface waters at GMIA. The initial characterization, conducted by GMIA and the United States Geological Survey (USGS), indicated the presence of PFAS at all sampling points and surface water discharge locations. On October 17, 2019, the DNR issued a responsible party letter requesting a complete site investigation to determine the nature, degree, and extent of PFAS contamination at GMIA.

SIWP Summary & Review

GMIA is planning to complete investigative activities to test specific media for the presence of PFAS. This SIWP describes the initial investigation activities in the phased approach that has been proposed. This initial phase will cover a broad range of potential sources and the second phase, if necessary, will further investigate areas with detected PFAS. The current scope of work will be composed of three tasks to collect soil, surface water, and groundwater at various locations based on past use, storage, or releases of AFFF. The SIWP indicates that

samples will be analyzed using Environmental Protection Agency Method 537-Modified, which includes the State of Wisconsin 36-compound list.

Based on information gathered by AECOM, the following potential source areas will be included within this scope of the investigation:

- Cargo Ramp
- Far West
- West Pad/West Ramp
- Southeast Area
- Bailey's Pond
- Burn Pit
- Fire Department

These potential release locations were selected for sampling based on criteria including testing of AFFF suppression systems in hangars, accidental or purposeful release of AFFF from hangars, fire training, annual testing of equipment, fire suppression from live fires, and disposal of AFFF.

The DNR has reviewed the SIWP for compliance with Wis. Admin. Code §§ NR 716.07 and 716.09, which contain the requirements for site investigation scoping and site investigation work plans. The DNR has determined that the SIWP is in general compliance with Wis. Admin. Code §§ NR 716.07 and 716.09 and provides the following general comments:

- The responsible party shall report all sampling results to the property owner and the DNR within 10 days of receipt, per Wis. Admin. Code § NR 716.14. The sampling results should also be shared with the 128th and the 440th.
- The initial samples collected by the USGS should be displayed on future site figures.
- Consider whether sediment samples should be collected in a future phase(s) of the investigation.
- The DNR does not have any established guidance on how to properly dispose of PFAS-contaminated investigation derived waste (IDW). AECOM should develop a procedure to address IDW.
- The DNR understands that hydraulic conductivity data may be collected in a later mobilization.
- Property boundaries and buildings should be labeled on future site figures.
- As site investigation activities commence, evaluate the need for remedial actions. If remedial actions are deemed necessary, ensure that the appropriate information to select a remedial action is collected and provided.
- Ensure to properly assess any off-site sources for migration of PFAS contamination onto the GMIA property.

The DNR also provides the following comments related to specific study areas:

- Cargo Ramp:
 - Consider collecting an additional surface water sample closer to the hangar.
 - Due to the apparent topographic tilt of this area, consider an additional sampling location in the grassy oval area to the southeast of the hangar.
- West Pad/West Ramp:
 - Consider collecting an additional surface water sample in the channel to the north of the hangar.
 - Consider moving sampling location WP-MW-19 to the grassy area at the southwest corner of the hangar or consider collecting adding an additional sampling location in that area.
- Burn Pit:

- Consider rearranging the currently proposed monitoring well network to include a monitoring well on the east side of the burn pit.

The site investigation can be an iterative process. Future sampling may indicate that further assessment is needed to define the degree and extent of contamination. Additionally, as knowledge surrounding PFAS continues to grow, further investigation may be necessary to define degree and extent of different compounds.

The DNR appreciates the efforts you are taking to address the contamination at GMIA. If you have any questions about this letter, please contact me, the DNR Project Manager, at (414) 750-7030 or via email at riley.neumann@wisconsin.gov.

Sincerely,



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

cc: Kenneth Brown, AECOM (electronic)
Joel Mackinney, AECOM (electronic)
Timothy Detzer, Milwaukee County (electronic)