



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 at a Different Site or Facility

Generating Property: General Mitchell International Airport, 5300 S. Howell Ave. Milwaukee, WI DNR BRRTS Activity #: 02-41-584547, FID #: 241280270

Receiving Properties:
Air Reserve Station (Former 440th), 300 E. College Ave., Milwaukee, WI
BRRTS Activity #: 02-41-583232, FID #: 241176980

General Mitchell International Airport, 5300 S. Howell Ave. Milwaukee, WI
DNR BRRTS Activity #: 02-41-584547, FID #: 241280270

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 3,000 cubic yards of contaminated soil on Air Reserve Station (Former 440th) in accordance with Wis. Admin. Code § NR 718.12. In addition, 2,000 cubic yards of contaminated soil is proposed to be managed on the General Mitchell International Airport (GMIA) parcel 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 the construction of a 30,000 square foot snow equipment warehouse/garage with auxiliary office space and stormwater detention areas. Total soil disturbance for the project area is estimated to generate approximately 5,000 cubic yards of contaminated soil. The contaminated material is impacted with per- and polyfluoroalkyl substances (PFAS). An approval through Wis. Admin. Code § NR 718.12 has been requested to manage the contaminated soil to construct a berm on another part of the General Mitchell International Airport parcel as well as a berm on the Air Reserve Station (Former 440th) parcel.

Wis. Admin. Code § NR 718.12 Approval

This letter grants an approval to manage contaminated soil under Wis. Admin. Code § NR 718.12. Approval is based on the following:

Compliance with Locational Criteria

Managing contaminated soil in areas of the site or facility identified on Figure 16, Figure 17, Figure 19, and Figure 20 of the approval request document will meet the locational criteria listed under Wis. Admin. Code § NR 718.12 (1) (c).

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, polycyclic aromatic hydrocarbons, polychlorinated biphenyls (in SB-8), metals, and volatile organic compounds from areas most likely to contain residual contamination. Based on an estimated volume of 5,000 cubic yards of soil, with 13 discrete samples collected in this area, the sampling protocol described in Wis. Admin. Code § NR 718.12 (1) (e) was not met. However, the DNR has determined that the soil was adequately characterized due to the generally consistent concentrations of contaminants detected across the project area.

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 contaminated soil at GMIA and 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 contaminated soil management.

Other Information

- 1) Any hazardous substance discharge discovered during 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 (Wis. Admin. Code § NR 724.15 (1)). 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 GMIA and 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 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 GMIA and 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 material that is excavated or otherwise disturbed at GMIA and 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 material 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 Bureau of Remediation and Redevelopment Tracking System (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) 02-41-584547.

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,

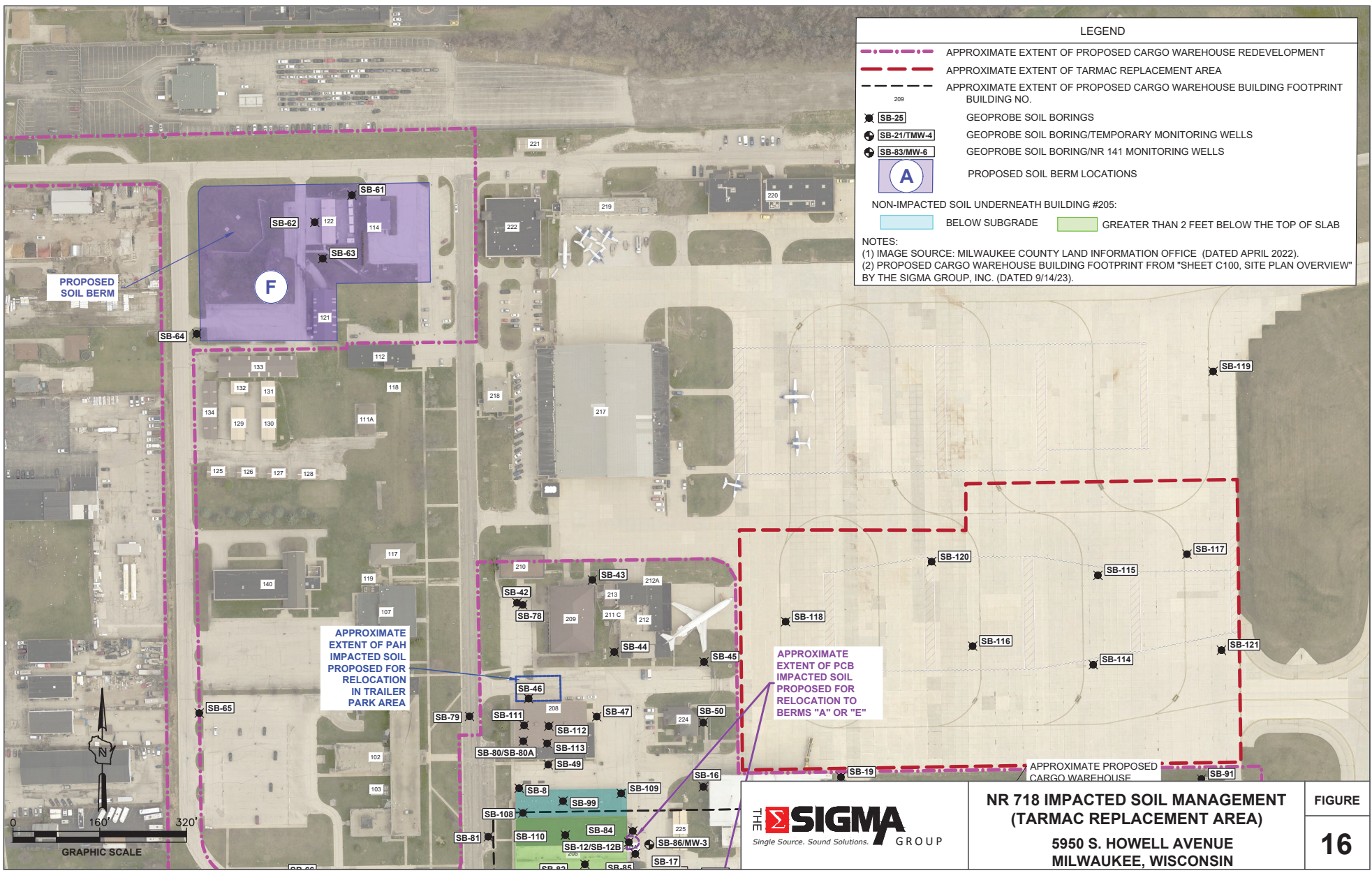


Hydrogeologist/Project Manager
Remediation & Redevelopment Program

Attachments: Figure 16, NR 718 Impacted Soil Management (Tarmac Replacement Area)
Figure 17, NR 718 Impacted Soil Management (Snowshed Area)
Figure 19, Conceptual Grading Plan (Tarmac Replacement Area)
Figure 20, Conceptual Grading Plan (Snowshed Area)

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

PROJECT: 20758 | DIRECTORY: CAD | FILENAME: 20758_NR718_04-artic_Placement.dwg | CREATED BY: JRS | DATE: 11/02/23



LEGEND

- APPROXIMATE EXTENT OF PROPOSED CARGO WAREHOUSE REDEVELOPMENT
- APPROXIMATE EXTENT OF TARMAC REPLACEMENT AREA
- APPROXIMATE EXTENT OF PROPOSED CARGO WAREHOUSE BUILDING FOOTPRINT BUILDING NO. 209
- 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
(TARMAC REPLACEMENT AREA)**
 5950 S. HOWELL AVENUE
 MILWAUKEE, WISCONSIN

**FIGURE
16**

LOCATION OF BERM "G" WITH SETBACKS TO EXISTING WATERWAYS & WETLANDS



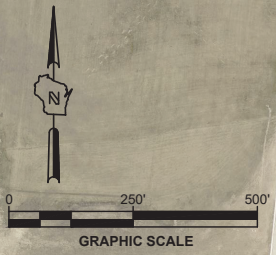
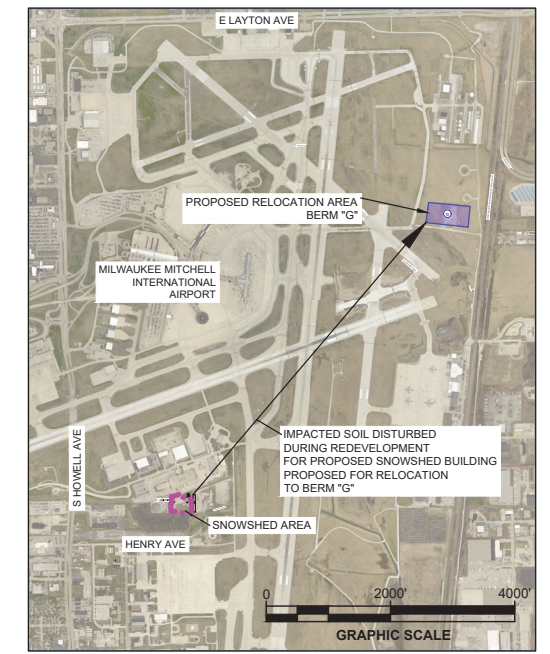
LEGEND

- APPROXIMATE EXTENT OF PROPOSED SNOWSHED GARAGE REDEVELOPMENT
- PROPOSED SOIL BERM LOCATION
- EXISTING WATERWAY
- EXISTING WETLAND

NOTES:

- 1) IMAGE SOURCE: MILWAUKEE COUNTY LAND INFORMATION OFFICE (MCLIO, DATED APRIL 2020).
- 2) LOCATIONS OF EXISTING WATERWAYS BASED ON INFORMATION FROM MCLIO AND THE WDNR'S SURFACE WATER DATA VIEWER (SWDV). THE LOCATION OF THE WETLAND IS BASED ON THE WDNR'S SWDV.

LOCATION OF SNOWSHED AREA RELATIVE TO RELOCATION AREA BERM "G"



PROJECT: 20758 | DIRECTORY: CAD | FILENAME: 20758_NR718_On-site_Placement.dwg | CREATED BY: JRS | DATE: 12/22/2023



NR 718 IMPACTED SOIL MANAGEMENT (SNOWSHED AREA)
5300 S. HOWELL AVENUE MILWAUKEE, WISCONSIN

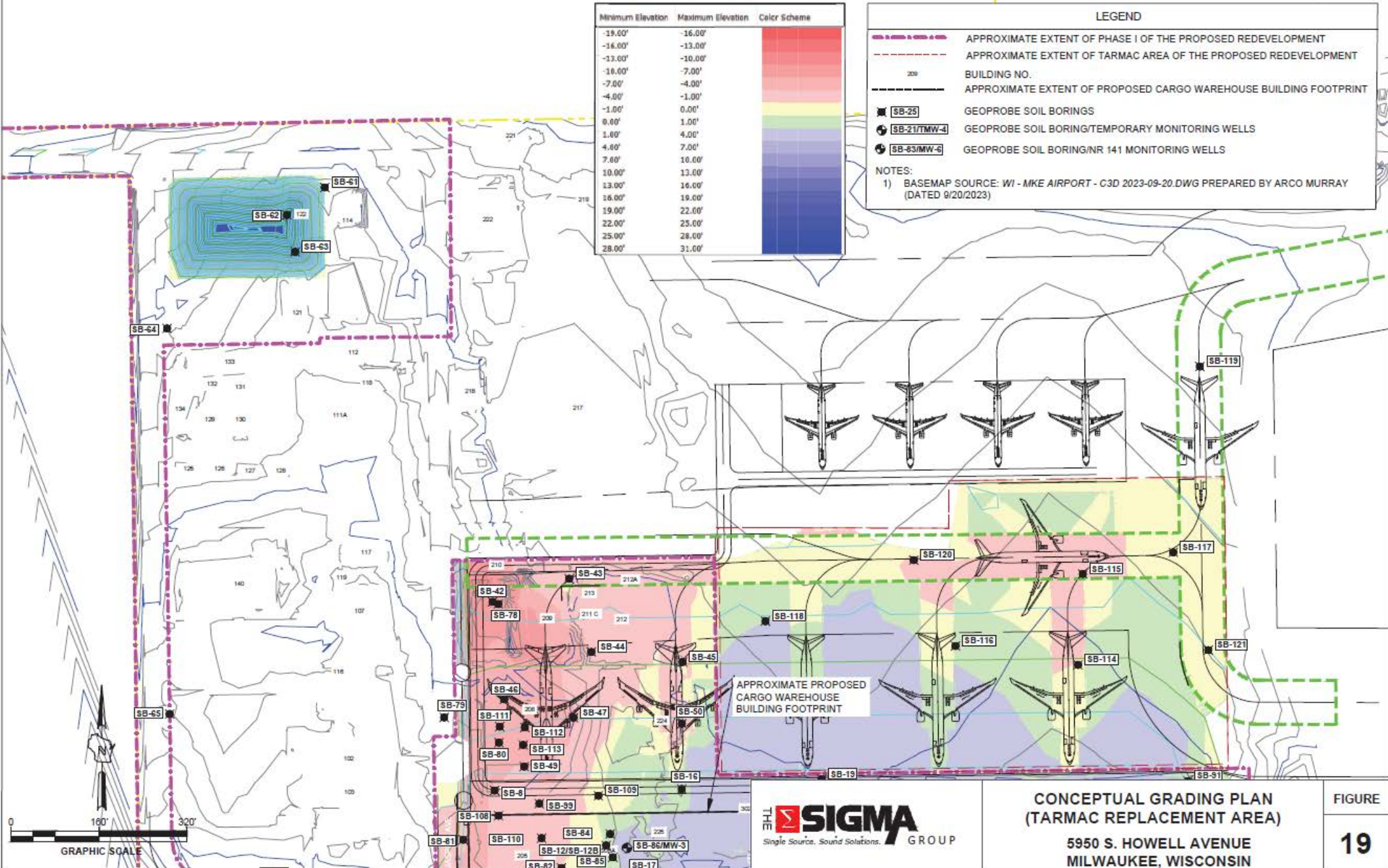
FIGURE 17

Minimum Elevation	Maximum Elevation	Color Scheme
-19.00'	-16.00'	[Color gradient from red to blue]
-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'	[Color gradient from blue to red]
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)



**CONCEPTUAL GRADING PLAN
(TARMAc REPLACEMENT AREA)**

**5950 S. HOWELL AVENUE
MILWAUKEE, WISCONSIN**



