



June 16, 2021

Ms. Amanda Sullivan
ARNG G9
111 South George Mason Drive
Arlington, Virginia 22204

Subject: Review of *Draft Final Site Inspection Report*
Army National Guard AASF #1 and Armory
105 S. Trenton Road & 125 Chopper Drive, West Bend, WI

Dear Ms. Sullivan:

On April 13, 2021, the Wisconsin Department of Natural Resources (DNR) received the *Draft Final Site Inspection Report* (Report), prepared by your consultant AECOM. The review fee for the Report is covered under an interagency agreement.

Background

West Bend Army Aviation Support Facility (AASF) #1 and Armory was constructed in 2004 on a parcel of land, approximately 35 acres, owned by the City of West Bend, and leased to the Wisconsin Army National Guard (WIARNG). The current West Bend AASF #1 and Armory facilities include administrative offices, classrooms, and hangars for the operation, maintenance, and repair of WIARNG rotary-winged aircraft. Two potential release areas were identified in the preliminary assessment report, and the results of the initial site inspections of those two areas are included within the Report. The preliminary assessment and site inspection, as well as the future remedial investigation, at the West Bend AASF #1 and Armory are part of a nationwide effort to investigate per- and polyfluoroalkyl substances (PFAS) at Department of Defense (DoD) facilities.

Report Summary

The Report summarizes the data collected as part of the site inspection conducted in October 2020. The site inspections followed DoD policy by comparing investigation results to specified screening levels. The two areas of interest (AOIs) identified during the preliminary assessment are AOI 1, the fire suppression system testing area, where 20-40 gallons of 3% aqueous film forming foam (AFFF) were dispensed onto the grassy area behind the nearby building annually since 2004, and AOI 2, the Tri-Max Release area, where a one-time reported training event with one Tri-Max fire extinguisher occurred in a grassy area on the east side of the Armory. The exact date, amount, and concentration of AFFF used are unknown. Based on the results of the site inspection, AECOM indicates that further evaluation of both AOIs is warranted in the remedial investigation phase.

DNR Comments

The DNR reviewed the Report for compliance with Wis. Admin. Code ch. NR 716, which establishes the requirements for site investigations conducted in the state of Wisconsin. Additional definition of degree and extent of contamination is needed to satisfy the requirements in Wis. Admin. Code ch. NR 716. The DNR provides the following comments:

- The DNR understands that the work being done at the West Bend AASF #1 and Armory are following the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. This does not, however, exempt a site from applicable state laws. Therefore, the DNR considers Wis. Admin. Code and Wis. Statutes as applicable or relevant and appropriate requirements (ARARs). The DNR standards for soil, sediment, surface water, and groundwater would also be ARARs.
- To satisfy the requirements of Wis. Admin. Code ch. NR 716, additional soil and groundwater sampling is required to define the degree and extent of contamination. Surface water and sediment sampling within Wingate Creek and the Milwaukee River is required to determine the extent of impacts to the waterways. The stormwater basin that is connected with the storm sewer in AOI 1 needs to be investigated.
- At the last two technical project planning (TPP) meetings, off-site private well sampling was discussed. The off-site private well sampling should be conducted as soon as possible.
- Per Wis. Admin. Code § NR 716.14, sampling results should be submitted to the DNR and to the property owner and occupants of the property within 10 business days of receiving the sample results.
- Wis. Admin. Code § NR 716.15(4) requires isoconcentration maps and cross sections depicting the degree and extent of contamination.
- Per Wis. Admin. Code NR §§ 708.05 and 708.11, identify what immediate and interim actions have been taken to halt, contain, or stabilize a hazardous substance discharge or environmental pollution and to minimize the harmful effects of the discharge or environmental pollution to the air, lands, or waters of the state. During the most recent TPP meeting, it was indicated that the AFFF at AOI is no longer discharged to the ground surface. Explain how the AFFF discharged during testing is handled.
- Per Wis. Admin. Code NR § 716.11(5)(a), migration pathways for contamination shall be evaluated. This should include the stormwater drain in AOI 1, including where that drain discharges and if the storm sewer is in good condition. For example, determine if there are cracks in the storm sewer that would allow for discharges into the subsurface. Additionally, have there been leaks or spills from the internal AFFF holding tanks and is the internal floor slab in the storage room in good condition? Assess other utilities on site for migration potential and include their locations on site figures.
- Per Wis. Admin. Code NR § 716.11(5)(b), evaluate the impacts of the contamination upon receptors. This includes surface water bodies and aquatic life, and those who use the surface water for recreation and those who consume the aquatic life.
- When conducting sampling for PFAS, analyze for the DNR's current list of 33 compounds, which can be found here: <https://dnr.wisconsin.gov/sites/default/files/topic/PFAS/LabUpdate20210301.pdf>.
- Future monitoring wells should be installed in accordance with Wis. Admin. Code ch. NR 141.

The DNR appreciates your efforts to address the contamination at this site. If you have any questions regarding 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
Project Manager / Hydrogeologist
Remediation & Redevelopment Program

cc: Tim Alessi, DNR (electronic)
Trevor Nobile, DNR (electronic)
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