

## 128TH AIR REFUELING WING

### MILWAUKEE, WIS.

#### Current Update – 8 February 2024

- Non-AFFF “Due Diligence” Program has kicked off across all ANG locations nationwide
  - Surveys, interviews, and data collection will commence at the 128 ARW in February
- Remedial Investigation
  - Currently #6 on priority list for ANG installations

#### HISTORICAL TIMELINE

Throughout the 1970-1980’s, the Air Force used C8-chain aqueous film forming foam (AFFF), also known as legacy foam. Per Federal Aviation Administration requirements at the time, it was the mandated substance used in firefighting foam at the 128th Air Refueling Wing (ARW) to extinguish jet fuel aircraft fires.

Since the 1990’s, the 128ARW has shared a cooperative relationship with the County of Milwaukee, serving as a first responder for military and civilian aircraft fire emergencies at General Mitchell International Airport.

In 2015, National Guard Bureau (NGB) announced to stop testing legacy AFFF at all military installations across the U.S. The 128ARW had already retrofitted two of the three buildings that contained the legacy foam systems to a more environmentally friendly high expansion foam system in 2008. The final building foam system was changed from the C8-based AFFF to the more environmental-friendly substitute C6-based AFFF in 2018.

In addition, all 128ARW fire trucks were drained and rinsed of legacy AFFF and disposed of through the Defense Logistics Agency (DLA) disposal service in 2016. The fire trucks were refilled with Air Force approved C6-based AFFF, a more environmentalfriendly substitute to the legacy foam.

When conducting training with the C6-based AFFF, the 128ARW only allows for water testing of the fire trucks for operational checks. Therefore, no AFFF is released to the environment.

The 128ARW continues to work closely with the Wisconsin DNR, the County of Milwaukee, the Air Force Civil Engineer Center, and General Mitchell International Airport to implement measures that will further the goal of PFAS-related remediation.

#### Additional Facts:

- 1970’s – 1980’s: General Mitchell International Airport fire department is mandated to store and use C8-based AFFF to respond to aircraft per FAA regulations. During this timeframe, multiple agencies were responsible for fire protection at General Mitchell, to include the County of Milwaukee, 440th Airlift Wing, and the 128 ARW.

- November 2008: Buildings 304 & 308 AFFF systems are replaced with high expansion foam systems as part of construction renovation project.
- August 2015: National Guard Bureau announces to stop testing aircraft rescue and firefighting vehicles with AFFF on all installations.
- December 2015: 128ARW receives the final Perfluorinated Compounds Preliminary Assessment Site Visit Report.
- May 2016: EPA establishes a lifetime health advisory for PFOS/PFOA at 70 parts per trillion in drinking water.
- November 2016: Excess containers of legacy AFFF disposed of through the Defense Logistics Agency (DLA) at the 128ARW.
- November-December 2016: Fire Trucks are drained and rinsed of legacy AFFF and replaced with Air Force approved C6-based AFFF, a more environmentally friendly alternative. Legacy AFFF from fire trucks is disposed of through the Defense Logistics Agency (DLA).
- October 2017: 128ARW receives final Site Investigation work plan.
- October 2017: AMEC Foster Wheeler, National Guard Bureau contractor, conducts a Site Investigation, installing temporary wells, collecting water samples and soil borings.
- March 2018: 128ARW receives results from the draft Site Investigation.
- August 2018: Legacy AFFF is removed from Building 208 (Hangar), rinsed, and replaced with Air Force approved C6-based AFFF. Legacy AFFF and rinse effluent is disposed of through the Defense Logistics Agency (DLA). The 128ARW is now 100% converted to the new C6-based AFFF and all legacy AFFF is removed from the installation.
- September 2018: 128ARW receives draft final Site Inspection report from AMEC Foster Wheeler, National Guard Bureau contractor. Document is reviewed and comments are submitted to the National Guard Bureau
- November 2018: 128ARW submits a Non-Emergency Discharge Notification to WI DNR on behalf of the National Guard Bureau contractor.
- December 2018: WI DNR issues a Responsible Party Notification Letter to the 128ARW and assigns BRRTS case # 02-41-582725 for PFAS Investigation.
- December 2018: 128ARW works with the National Guard Bureau and the Defense Logistics Agency (DLA) to transfer monitoring wells no longer needed as part of DLA's Jet Fuel Offloading Facility (a separate investigation) that were scheduled to be abandoned to the PFAS

Investigation. These monitoring wells will be used in the Remedial Investigation when it begins.

- January 2019: 128ARW receives WI DNR draft final Site Investigation Review Letter. The letter is forwarded to the contractor and the National Guard Bureau.
- March 2019: 128ARW receives the final Site Investigation report from AMEC Foster Wheeler, National Guard Bureau contractor.
- April 2019: Milwaukee Mitchell International Airport (previously named General Mitchell International Airport) receives guidance from WI DNR to sample storm water outfalls for PFAS.
- October 2019: Milwaukee International Airport releases sample data to WI DNR.
- October 2019: WI DNR issues responsible party letter to Milwaukee Mitchell International Airport, 128ARW, and the Air Force Civil Engineer Center (440th Air Wing) to address PFAS in storm water.
- November 2020: A contractor with the Air National Guard Readiness Center conducts a Relative Risk Site Evaluation based upon data from Site Inspection.
- Ongoing: Coordination and meetings continue between WI DNR, Air Force Civil Engineer Center, 128ARW, and Milwaukee International Airport.
- The next step for the 128ARW in the Comprehensive Environmental Response Compensation Liability Act (CERCLA) process is a Remedial Investigation (RI). Currently, the RI is pending funding