WISCONSIN AIR NATIONAL GUARD
HEADQUARTERS 115TH FIGHTER WING (ACC) (ANG)
3110 MITCHELL STREET
MADISON WISCONSIN 53704-2529

25 February 2021

MEMORANDUM FOR WISCONSIN DEPARTMENT OF NATURAL RESOURCES

FROM: 115 CES/CC

SUBJECT: XGFG189004 Construct Alert Shelters – Materials Management Plan
BRRTS #: 02-13-585319

1. Pursuant to Wisconsin Administrative Code NR 700 a materials management plan is required for materials that could/will be removed that contain contaminants of concern. On 10 March 2020, WI DNR provided to the 115 FW a Site Characterization Sampling Plan for contaminated material management purposes for the subject project as well as project XGFG182005 F-35 Repair Apron. This memorandum serves as the material management plan that the 115 FW plans to follow while constructing the subject project. Pursuant to the 10 March 2020 sampling plan, samples for VOC's and perfluorinated compounds were not required "based on known and expected site characteristics". However, the results of the apron, and associated management plan, will be used as a guide for execution of the above subject project.

2. **Simulator Site Soil Results** – A review of all four sample locations at both sample depths (8 samples in all), all 9 samples (Boring 2 had a duplicate taken) had some concentration of perfluorinated compounds. However, 7 of the 9 samples only had PFOS present in values above an "estimated" concentration. PFOS being the main contaminant of concern found ranged in value from 1.2 µg/Kg to 36 µg/Kg. A complete summary of all data is found within Attachment 1, Nov 2020 PFOS Test Report from the U.S. Army Corps of Engineers.

3. **Site Soil Handling and Disposition** - All soil excavated and removed as a condition of this project for the installation of an aircraft hangar will be removed and managed as a solid waste by placement in a Subtitle D solid waste landfill. Utilities will be directionally bored to enable aircraft to still operate around the site during construction. The site currently consists of concrete pavements. Predominately, all concrete areas will not require excavation of base course, but re-compaction of existing soils. Base course and subgrade found to not support re-compaction will be excavated and landfilled. The construction site will be an entirely impervious surface (ie concrete) at the end of construction. There will be no net change in impervious surface.

4. **Simulator Site Water Results** – All four sample locations (5 samples total – Boring 2 contained a duplicate) at groundwater indicate up to 20 different perfluorinated compounds (of the 36 sampled) exist in varying amounts across the site. Specifically to the largest contributors and most likely to be regulated in the future, PFOS amounts ranged from 200 ng/L to 48,000 ng/L (average 9,906 ng/L) with Boring 3 being the highest concentration at 48,000 ng/L. PFOA amounts ranged from 6.4 to 2,100 ng/L (average 487.48 ng/L) with Boring 3 being the highest

concentration at 2,100 ng/L. For VOC's, there were no exceedances of enforcement limits on any compound.

5. **Site Water Handling and Disposition** - For the subject project site, dewatering of the project is not anticipated to be required based upon site investigation, boring logs, PFOS testing, and project drawings. Given the level of the water table and known construction elevations, a dewatering permit to allow discharge of PFOS containing water will not be obtained. If during construction it becomes clear that constructing around the infiltrating groundwater is not possible, the water will be removed, placed in a container and not discharged until either a) a proper WPDES dewatering permit can be obtained or b) is allowed to be discharged to the Madison Metropolitan Sewer District (in which case WI NR 200.03 (3) (a) would apply).

6. The above and attached is the 115th Fighter Wing's approach to material management for construction project: XGFG189004 Construct Alert Shelters, BRRTS #: 02-13-585319 at Truax. If you have any additional questions, please feel free to contact me at 608-286-0010 or michael.dunlap@us.af.mil at any time. Thank you in advance for your review of this material management plan.

DUNLAP.MICHAEL.J.1138452693 Digitally signed by DUNLAP.MICHAEL.J.1138452693 Date: 2021.02.25 06:25:32 -06'00'

MICHAEL J. DUNLAP, Lt Col, WI ANG
Commander, 115 Civil Engineer Squadron
Base Civil Engineer

Attachment:
1. Nov 2020 PFOS Test Report dated 13 November 2020