



**Response to January 21, 2021
Letter Site Investigation Work Plan
for BRRTS Activity
#02-13-584369 and #02-13-584472**

Plan prepared by



April 16, 2021

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1.0 Introduction

Pursuant to the Wisconsin Department of Natural Resources (WDNR) January 21, 2021 letter, this document provides a description of activities being initiated at the Dane County Regional Airport (Airport) to continue the investigation of reported and suspected per- and polyfluorinated alkyl substances (PFAS) discharges and plan and implement interim actions to reduce the discharge of PFAS to Starkweather Creek. These activities fall into two potential source categories: 1) the Fire Fighting Training Areas (FFTAs) (BRRTS Activity #02-13-584369) and 2) stormwater discharges (BRRTS Activity #02-13-584472).

In the case of the FFTAs, past investigations have indicated the presence of PFAS in soil and groundwater samples collected at both the Darwin Street and Pearson Street FFTAs. Further investigation of the FFTAs is needed to determine if the FFTAs are impacting the PFAS concentration in Starkweather Creek. The Wisconsin Air National Guard (WI ANG) has initiated a remedial investigation (RI) that includes the FFTAs. The findings of that process will guide additional interim actions to mitigate creek effects if any are found.

In the case of the stormwater discharges, sampling data has established the presence of PFAS compounds in discharges from certain Airport stormwater outfalls. Specific sewer segments within the storm sewer networks draining to outfalls 001, 021, and 032 are estimated to contribute more than 90 percent of the total PFAS load in Airport stormwater discharges. Therefore, the need is to identify specific locations of sources of illicit groundwater discharges containing PFAS into the storm sewer system so that interim corrective actions can be taken. Corrective actions will include slip lining, grouting, or other methods of removing infiltrating groundwater and associated PFAS discharge to Starkweather Creek.

Task 1 of this investigation will locate specific sources of groundwater infiltration into segments of the storm sewer system with the highest concentrations and loadings of PFAS. These sources will then be evaluated for the most effective way to isolate and eliminate infiltration into the storm sewer system, and then the recommended solution will be implemented. In addition, a pilot implementation of adsorptive media technology (i.e., BAM Booms) will be maintained at Outfall 021 for the incremental benefits it provides in PFAS removal from stormwater flows.

Task 2 consists of additional PFAS sampling in the West Branch of Starkweather Creek to better define and understand the presence of PFAS in Starkweather Creek as it leaves the Airport. Samples collected by WDNR in the West Branch of Starkweather Creek downstream of Anderson Street indicate the PFAS concentration continues to increase from Anderson Street to the junction with the East Branch of Starkweather Creek near Fair Oaks Avenue. There has been speculation that the increase in PFAS concentration in Starkweather Creek downstream of the Airport is primarily due to incomplete mixing of the tributary to Starkweather Creek located at the southeast corner of the airport before the sampling location downstream of Anderson Street (Sampling Station 4). A dye test of the Creek will establish an appropriate location to sample Starkweather Creek downstream of the Airport. Three (3) sets of samples will be collected in Starkweather Creek before and after the restoration of the storm sewers in Task 1. These results will be used to indicate if there are additional PFAS sources discharging to Starkweather

Creek immediately downstream of the Airport and quantify the reduction of PFAS in Starkweather Creek as a result of the interim actions.

This work plan has been developed to address elements specified in Wisconsin Administrative Code NR 708.11. A description of the site and details of the proposed investigation and strategy for this interim action for the discharge of PFAS from the storm sewer system are presented in this plan.

2.0 Background and Facility Information

2.1 Site Name and Information

Site Name:	Dane County Regional Airport
Site Address:	4000 International Lane, Madison, WI 53704
Site Location:	All or parts of Sections 16, 17, 18, 19, 20, 21, 28, 29, 30, 31, and 32 of Dane County Township 8N., Range 10E. See Appendix A for Airport Property Map.
Responsible Parties:	Wisconsin Air National Guard (WI ANG), 3110 Mitchell Street, Building 1210, Madison, WI 53704-2529
	Dane County Regional Airport, 4000 International Lane, Madison, WI 53704
	City of Madison, 210 Martin Luther King Blvd., #403, Madison, WI 53703
Consultants Involved:	Mead & Hunt, 2440 Deming Way, Middleton, WI 53562-1562

A map showing the location and site layout of the Airport is shown in **Figure 1** and **Appendix A**.

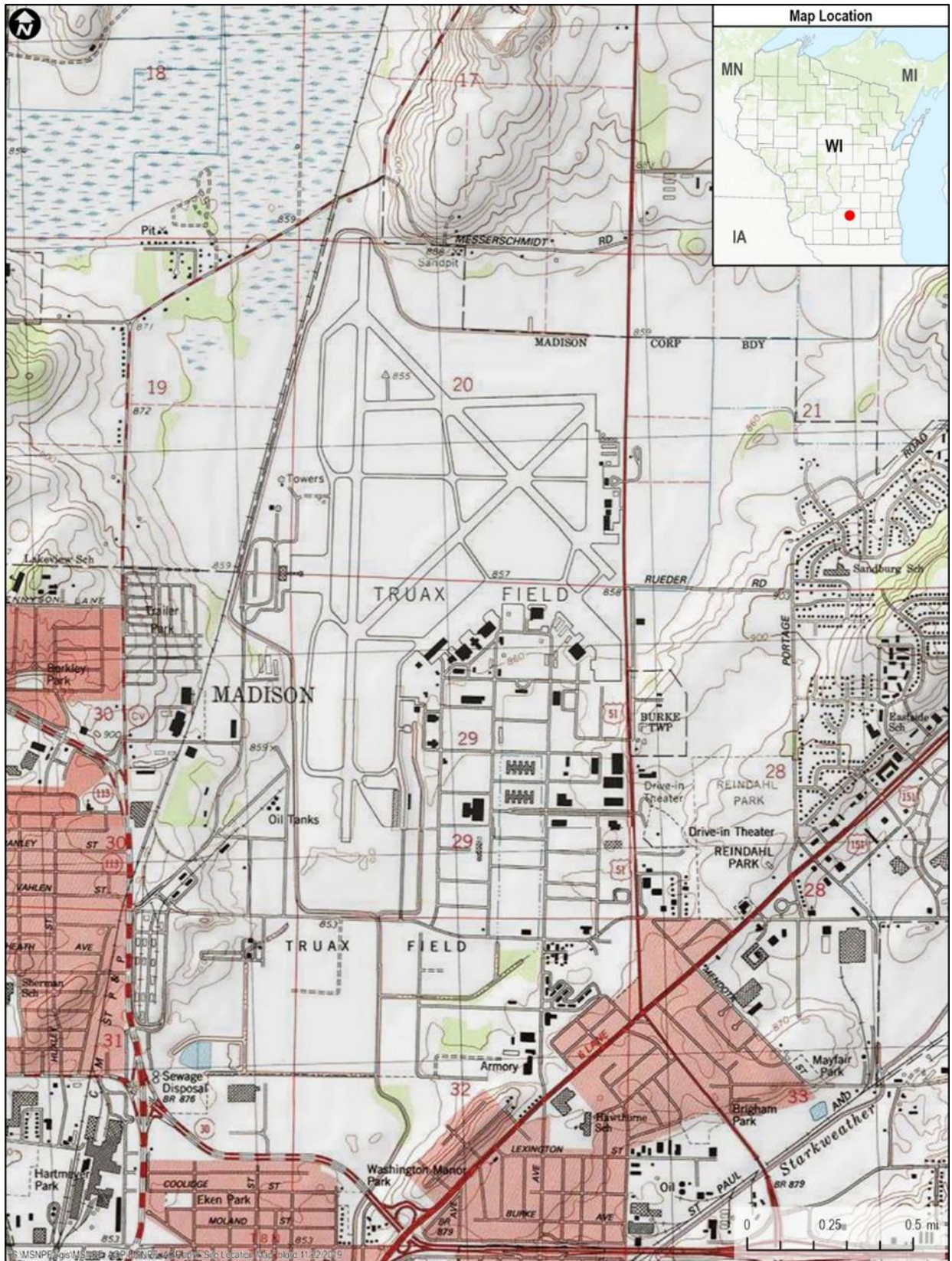


Figure 1. Topographic Quadrangle (De Forest Quad) Showing Location of the Airport.

2.2 Summary of Information Gathered During Previous Investigations

Two sources of information were reviewed as part of the preparation of this work plan: the dry season and wet season storm sewer sampling conducted in February and July 2020, respectively and surface water sampling in Starkweather Creek conducted in 2019 and in 2019 by WDNR¹.

In June 2019, WDNR collected surface water samples at four locations on Starkweather Creek, three (3) of which are downstream of the Airport. Varying numbers of PFAS compounds were detected in all samples at varying concentrations with a maximum result of 270 ng/L reported for PFOS at the Fair Oaks Avenue location on the West Branch. This location is approximately 1.5 miles downstream of the Airport and the PFOS result was over three times higher than the result reported at the Anderson Street location, which is immediately downstream of the Airport.

In October 2019, WDNR collected surface water samples from an additional eleven (11) locations on Starkweather Creek, five (5) locations in Lake Monona, and fish samples from Starkweather Creek and Lake Monona. Varying PFAS compounds were detected in all samples at concentrations ranging from less than 5 ng/l to a maximum result of 3,700 ng/L reported for PFOS. The highest PFOS concentration was reported for a sample collected on an unnamed tributary to the West Branch of Starkweather Creek just east of where the West Branch of Starkweather Creek crosses Anderson Street. This location is south of the Airport and WI ANG property. The fish samples were collected from the lake, four (4) near the mouth of Starkweather Creek and one (1) further to the southwest away from any immediate effects of water from Starkweather entering the lake. The PFOS concentrations ranged 9.8-12 ppt and the PFOA concentrations ranged from 2.4-2.9 ppt.

In February and July 2020, Mead & Hunt and LimnoTech collected samples and estimated flow rates from all storm sewer outfalls with flow and at select locations within the storm sewer collection networks for outfalls 001, 021, and 032. The February monitoring was conducted during dry season conditions and the results reported to WDNR in May 2020. The July monitoring was conducted during wet season conditions but not during an actual storm event. The July monitoring results were reported to WDNR in November 2020. This monitoring indicated that approximately 90 percent of the mass loading of PFAS discharged from the Airport's storm sewer outfalls comes from outfalls 021 and 032. The samples collected within the storm sewer network of outfall 021 indicate the source of PFAS containing groundwater is in the section of storm sewer running north to south immediately upstream of the outfall. The samples collected within the storm sewer network of outfall 032 indicate the source of PFAS containing groundwater are in the sections of storm sewer in the southern end of the drainage are closest to the WI ANG base.

Information from these sources has been used to prepare this work plan and will continue to be reviewed, along with the findings of the efforts described in this work plan, to inform appropriate future investigation activities.

¹ WDNR public notice.

2.3 Physiographic and Geological Setting Information

This section provides general physiographic and geological setting information as summarized in the Phase 1 Regional Site Inspection of Truax Field and other sources.

2.3.1 Topography

The Airport is in south central Wisconsin, northeast of the city of Madison. The Airport is located at an elevation of approximately 890 feet above mean sea level (MSL) and topography at the Airport is generally level. The Airport is within the Great Lakes Section of the Central Lowlands Physiographic Province, which is characterized by numerous lakes with associated lacustrine plains, prominent end moraines, and a still partially exposed cuestaform topography². Lakes Mendota, Monona, and Waubesa are located to the southwest and south of the Airport.

2.3.2 Surface water drainage

Surface water drainage at the Airport is to Starkweather Creek, which flows around the Airport on the north, west, and south sides. Surface water flow at the Airport is conveyed by ditches, culverts, and storm sewers that outfall to Starkweather Creek. Starkweather Creek empties into Lake Monona approximately 2 miles to the south.

2.3.3 Geology

Information provided in the Phase 1 Regional Site Inspection of Truax Field include the following summary observations that we believe to be representative of the Airport:

- Bedrock in the Central Lowlands Physiographic Province is primarily of Paleozoic age. There is also some bedrock of Cretaceous age underlying the western boundary of the province.
- Rock strata are generally flat to gently inclined, and the topographic effects of glaciation are common throughout the province.
- Structurally, regional dips are controlled by numerous domes and uplifts. Except the southern border, the entire province is bordered by topography that is higher in elevation³. Glacial deposits in southern Wisconsin range in thickness from a few feet to several hundred feet. Because the Airport is situated on a locally thick (approximately 300 feet) section of glacial drift, several geologic layers encountered elsewhere in the

² PEER Consultants, P.C., 1988. Final Preliminary Assessment, 128th Tactical Fighter Wing, Wisconsin Air National Guard, Truax Field, Madison, Wisconsin in *FY 16 Phase 1 Regional Site Inspections for Perfluorinated Compounds, Wisconsin Air National Guard Truax Air National Guard Base Madison, WI*. Amec Foster Wheeler Environment & Infrastructure, Inc. March 2019.

³ PEER Consultants, P.C., 1988. Final Preliminary Assessment, 128th Tactical Fighter Wing, Wisconsin Air National Guard, Truax Field, Madison, Wisconsin in *FY 16 Phase 1 Regional Site Inspections for Perfluorinated Compounds, Wisconsin Air National Guard Truax Air National Guard Base Madison, WI*. Amec Foster Wheeler Environment & Infrastructure, Inc. March 2019.

region do not occur beneath the Airport. There is an approximately 350-foot layer of Mt. Simon Sandstone bedrock beneath the glacial till underneath the Airport⁴.

2.4 General Hydrogeologic Information

Information provided in the Phase 1 Regional Site Inspection of Truax Field includes the following summary observations that we believe to be representative of the Airport:

- Regionally, groundwater is found in the unconsolidated glacial deposits and underlying bedrock formations including sandstone of the Trempealeau Group, the deeper Tunnel City Group, and the underlying Elk Mound Group. These bedrock aquifers comprise the principal water supply aquifers in Dane County. The Mt. Simon Sandstone underlying the glacial deposits in the vicinity of the Airport is the lowermost formation of the Elk Mound Group.

Based on information collected during 2017 investigation activities, monitoring wells within the water table zone indicate shallow groundwater flow is generally toward the south and southeast. The water table at the Airport is generally encountered at depths of 5 to 10 feet below ground surface, and groundwater flow gradients calculated from the investigations indicate groundwater flow velocities of 0.5 to 0.9 feet per day.

⁴ FY 16 Phase 1 Regional Site Inspections for Perfluorinated Compounds, Wisconsin Air National Guard Truax Air National Guard Base Madison, WI. Amec Foster Wheeler Environment & Infrastructure, Inc. March 2019.

3.0 Task 1 – Mitigation of PFAS Sources to Storm Sewer Discharges

3.1 Storm Sewer Televising

The Airport will work with a contractor to televise the storm sewer sections identified in Figure 2. These sewer sections were selected based on elevated PFAS concentrations in samples collected during the 2020 PFAS sampling. The contractor will provide a video of the storm sewer inspection and report identifying defects observed. This data will be used to identify appropriate storm sewer remediation to reduce the amount of PFAS contaminated groundwater entering the storm sewer system in outfalls 021 and 032.

3.2 Storm Sewer Restoration

Storm sewer defects identified in subtask 3.1 will be corrected using a combination of slip lining, spot repairs of broken pipes, grouting pipe joints, and installation of anti-seepage collars. Sediments in the storm sewers to be repaired will be removed. The specific combination restoration techniques will be determined based on the storm sewer televising. Construction documents will be prepared for this work so the Airport can procure this work in accordance with local, state, and federal regulations.

After completion of the storm sewer restoration, outfalls 021 and 032 will be resampled for PFAS to evaluate the effectiveness of the restoration in reducing PFAS discharges. Outfalls 021 and 032 will be sampled for the parameters listed in Table 1. Sampling procedures will follow the QA/QC measures identified in sections 4.2.3 and 4.3.

3.3 BAM Booms at Outfall 021

The Airport has worked with ORIN Technologies LLC to install BAM booms at Outfall 021 as a pilot study to evaluate removal of PFAS. Bench top tests of the BAM resulted in over 99% removal of the PFOA and PFOS. The results of the field pilot study have been highly variable PFAS removal rates. This variability is likely due to a combination of water bypassing the BAM booms and sediments being disturbed during sampling and repositioning the BAM booms. Typical PFOS removal was reported to be around 18% and typical PFOA removal was reported to be around 4%. This data has been reported to WDNR in a separate email. The Airport intends to maintain and continue to optimize the operation of the BAM booms at outfall 021 to take advantage of incremental benefits afforded by their removal of PFAS, at least until the completion of the interim actions.

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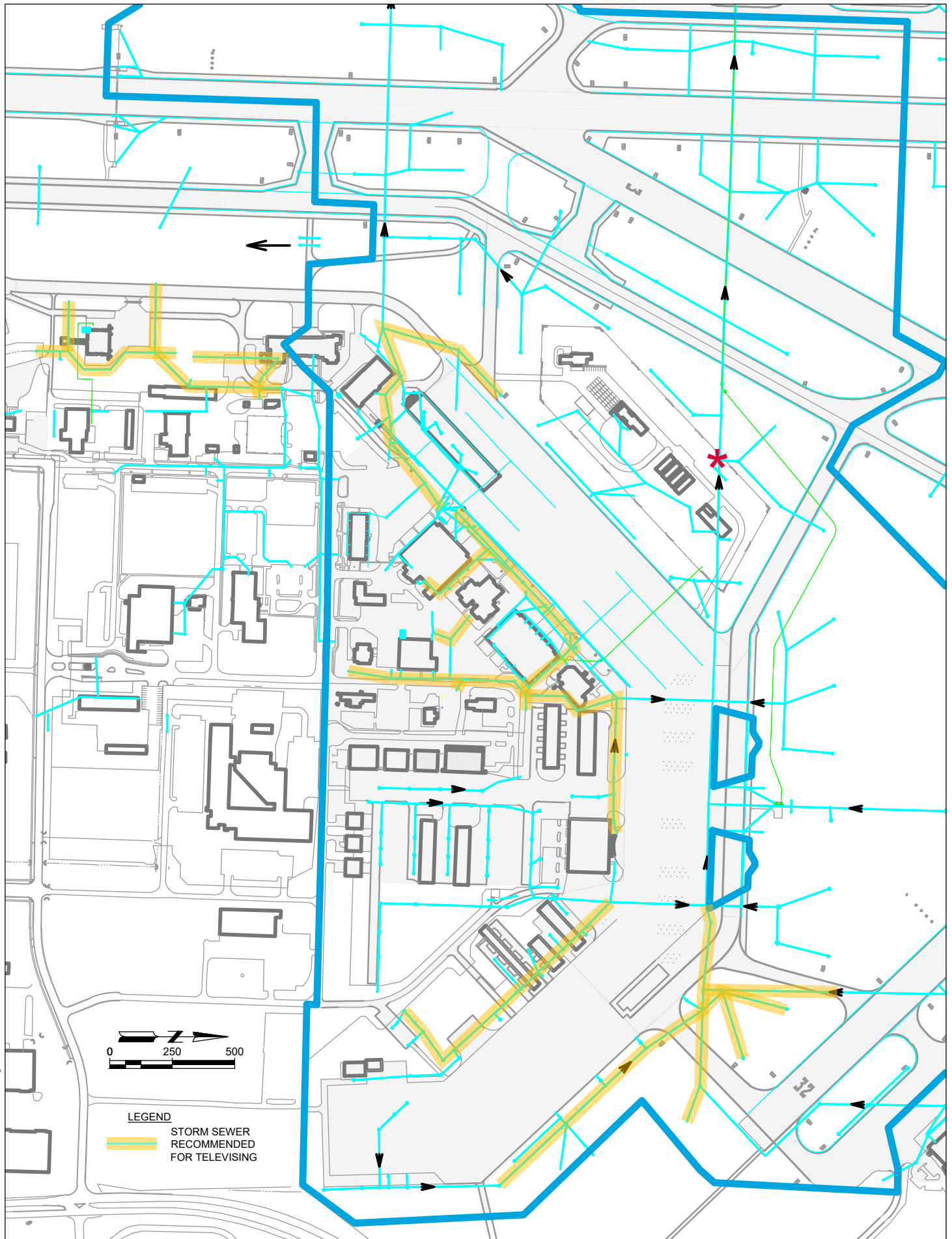


Figure 2 STORM SEWER RECOMMENDED FOR TELEVISIONING

4.0 Task 2 - Starkweather Creek Monitoring

The Monitoring Program discussed in this section describes the strategy, locations, methods, and frequencies for monitoring activities under this study. This section also includes a description of QA/QC measures that will be employed and the estimated schedule of activities.

4.1 Sampling Strategy

The strategy for Starkweather Creek sampling is to identify the zone of mixing where the two reaches of Starkweather Creek come together at Anderson Street and determine if other sources of PFAS entering Starkweather Creek between Anderson Street and Fair Oaks Avenue.

Starkweather Creek Dye Test

A dye test will be conducted to visually determine the location of complete mixing of the unnamed tributary of Starkweather Creek located on the southeast side of the Airport and the West Branch of Starkweather Creek as it leaves the Airport at Anderson Street. Rhodamine dye will be released into the unnamed tributary on the southeast side of the Airport. Visual observations will be used to determine the location of complete mixing of the dye in Starkweather Creek downstream of Anderson Street. This location will be used for monitoring of Starkweather Creek immediately downstream of the Airport.

4.2 Monitoring Locations

Starkweather Creek will be sampled at the locations shown in **Figure 3**. Sampling station 4 is located on the West Branch of Starkweather Creek approximate 20 feet south of Anderson Street. Sample station 7 is located on the West Branch of Starkweather Creek near the intersection of Commercial Avenue. Sampling station 10 is located on a tributary of the West Branch of Starkweather Creek approximately 20 feet east of where this tributary enters the West Branch of Starkweather Creek near Anderson Street. Sampling station 11 is located on the West Branch of Starkweather Creek approximately 20 feet upstream of Anderson Street. The exact location of sampling point 4 will be established by the dye test. Samples will be collected as grab samples. These sample locations were selected to replicate sampling conducted by WDNR in 2019. The flow rate at each sampling location will be measured by taking a cross section of the creek and measuring the average water velocity. The mass loading of PFAS will be calculated at each location for each sampling event using the PFAS concentrations and Starkweather Creek flow rates. This information will be used to determine if the increase in PFAS concentrations from sample point 4 to 7 was due to incomplete mixing at sample point 4 or if other PFAS sources are contributing to Starkweather Creek between sample points 4 and 7. The post storm sewer restoration sampling will be used to document the reduction in PFAS loading to Starkweather Creek.

4.2.1 Monitoring Events and Sampling Frequency

The dye test and Starkweather Creek sampling event will take place during dry weather (no active rainfall or melting snow) when the Starkweather Creek flow is between 2-10 cubic feet per second as measured at the flow monitoring station the Airport maintains as part of their glycol

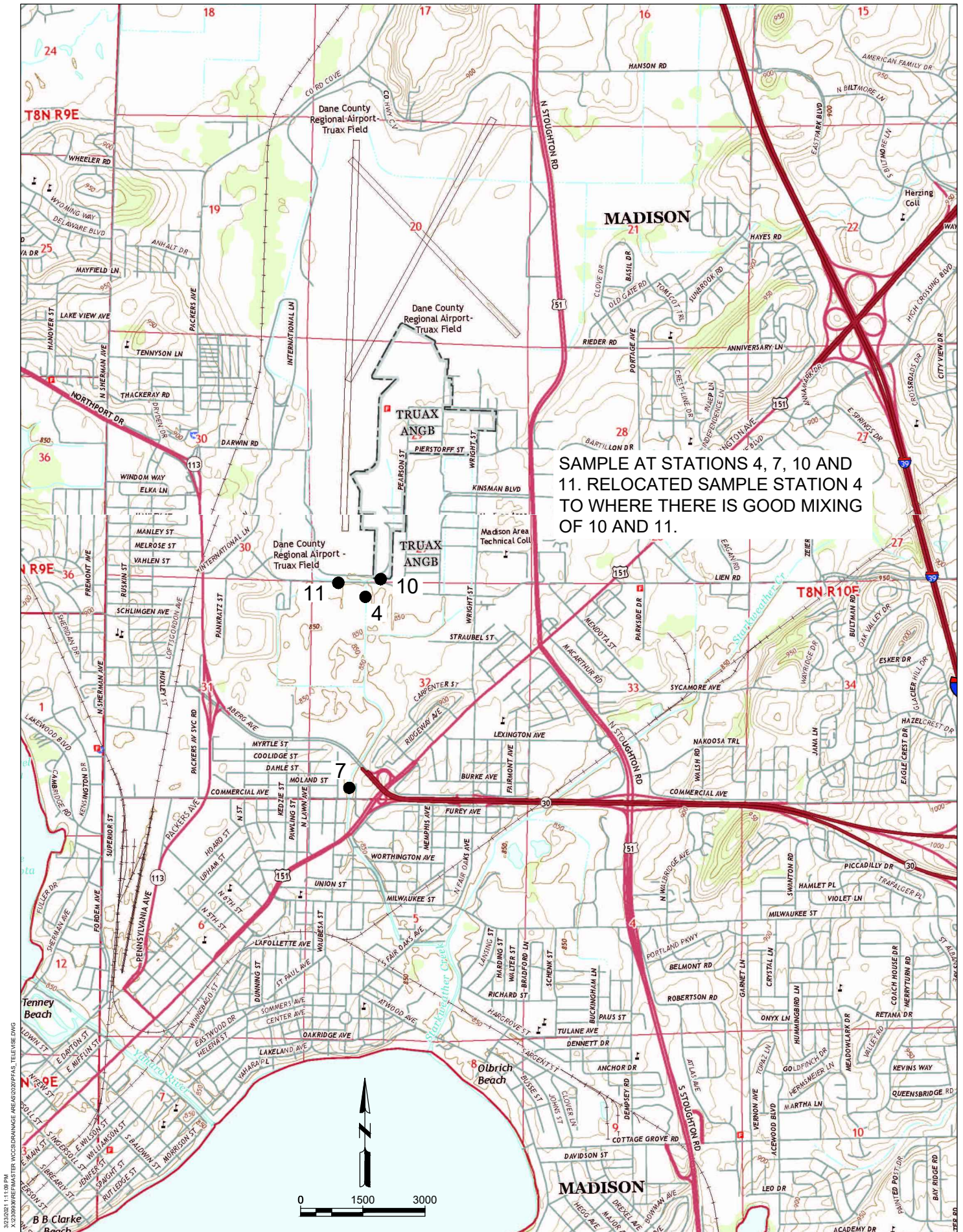


Figure 3 PFAS CREEK SAMPLING LOCATIONS

management system. This range represents a “normal base flow”. Six sampling events of Starkweather Creek are proposed at this time. Three will be conducted before and three will be conducted after the storm sewer restoration in Task 1.

4.2.2 Analytical Parameters and Methods

Creek samples will be collected manually, as grab samples at each location. Each sample will be analyzed for appropriate PFAS compounds using Method 537 (Modified). Samples collected will be submitted to a certified, qualified Laboratory for analysis. Table 1 provides a summary of PFAS compounds to be analyzed and expected quantitation limits as provided by the laboratory.

Table 1. Summary of Stormwater Sampling PFAS Analytical Parameters.

Analyte Name	CAS#	Analyte	RL (ng/l)
Perfluorobutanoic acid	375-22-4	PFBA	6.9
Perfluoropentanoic acid	2706-90-3	PFPeA	3.4
Perfluorobutanesulfonic acid	375-73-5	PFBS	3.4
Perfluorohexanoic acid	307-24-4	PFHxA	3.4
Perfluoroheptanoic acid	375-85-9	PFHpA	3.4
Perfluorohexanesulfonic acid	355-46-4	PFHxS	3.4
6:2 Fluorotelomer sulfonic acid	27619-97-2	6:2-FTS	6.9
Perfluorooctanoic acid	335-67-1	PFOA	3.4
Perfluoroheptanesulfonic acid	375-92-8	PFHpS	3.4
Perfluorooctanesulfonic acid	1763-23-1	PFOS	3.4
Perfluorononanoic acid	375-95-1	PFNA	3.4
Perfluorodecanoic acid	335-76-2	PFDA	3.4
8:2 Fluorotelomer sulfonic acid	39108-34-4	8:2-FTS	6.9
Perfluorooctane sulfonamide	754-91-6	PFOSA	3.4
Perfluorodecanesulfonic acid	335-77-3	PFDS	3.4
Perfluoroundecanoic acid	2058-94-8	PFUnA/PFUdA	3.4
Perfluorododecanoic acid	307-55-1	PFDoA	3.4
Perfluorotridecanoic acid	72629-94-8	PFTTrDA	3.4
Perfluorotetradecanoic acid	376-06-7	PFTTeDA	3.4
N-ethyl perfluorooctanesulfonamidoacetic acid	2991-50-6	EtFOSAA	17.0
N-methyl perfluorooctanesulfonamidoacetic acid	2355-31-9	MeFOSAA	17.0
4:2 Fluorotelomer sulfonic acid	757124-72-4	4:2-FTS	6.9
Perfluoropentane sulfonic acid	2706-91-4	PFPeS	3.4
Perfluorononane sulfonic acid	68259-12-1	PFNS	3.4

4.2.3 Quality Assurance / Quality Control

This section outlines the QA/QC measures that will be used during field monitoring activities.

Field Sampling Custody

The objective of field sample custody is to assure that samples are traceable and are not tampered with between sample collection and receipt by the analytical laboratory. A person will have custody of a sample when the samples are:

- In their physical possession;
- In their view after being in their possession;
- In their personal possession and secured to prevent tampering; and
- In a restricted area accessible only to authorized personnel, and the person is one of the authorized personnel.

Field custody documentation will consist of both field log books and chain of custody forms.

Field Logbooks

Field logbooks serve as a daily record of events, observations, and measurements during field activities. All information pertinent to monitoring activities is recorded in the logbooks, and will include:

- Name and title of author
- Name(s) of field crew personnel
- Name of site and project code
- Description of sample location
- Number and volume of samples taken
- Date and time of collection
- Sample identification numbers
- Sampling method
- Preservatives used
- Field measurements (flow rates, temperature, pH, etc.)
- Field observations (weather conditions, flow appearance, etc.)
- GPS coordinates for each sampling location.

Chain-of-Custody Forms

Completed chain-of-custody forms will be required for all samples to be analyzed. Chain-of-custody forms will be prepared by the field sampling crew during the daily sample collection events. The chain-of-custody form will contain the following information:

- Unique sample identification number
- Sample location

- Sample date and time
- Sample description
- Sample type
- Sample preservation
- Analyses required
- Sampling staff

The original chain-of-custody form will accompany the samples to the laboratory. The chain-of-custody forms will remain with the samples and will be signed by a representative of the laboratory upon receipt of the samples.

Quality Control Requirements

Field Measurements

The accuracy of field measurements will be maintained through calibration of the field instruments according to manufacturer's specifications. Accuracy will be checked prior to the sampling event and following the sampling event and recorded in the field logbook.

Field Duplicates

Field duplicates (splits) will be collected and analyzed to check the precision or reproducibility of sampling and analytical procedures. Field duplicates are defined as two separate samples collected at a single location and time, labeled with separate identification codes so the laboratory cannot identify the samples as duplicates. Duplicate samples will be collected at the rate of approximately 10 percent. The duplicate samples will be handled and analyzed by the laboratory as with all other samples.

Field Blanks

Field blanks will be analyzed to check for chemical constituent infiltration and sample bottle contamination originating from sample transport and storage. A field blank will consist of analyte-free water poured into a sample bottle at the sample site and preserved according to the parameters to be analyzed. Field blanks will be collected at the rate of one per event.

4.3 Special Precautions: PFC-Free Equipment, Supplies, and Materials

Special precautions shall be employed to minimize the possibility of sample cross-contamination related to the low PFAS detection limits and the widespread use of PFAS in consumer products and industrial processes, including:

- Conduct sampling beginning in areas of known or suspected lowest concentrations and progressing to areas of highest concentrations;

- Water used for equipment cleaning/rinsing will be sampled periodically to evaluate potential PFAS content;
- Sampling equipment and materials should be free of polytetrafluorethylene (PTFE), ethylene tetrafluoroethylene (ETFE), and fluorocarbon-based products (e.g., field filters, sample tubing, etc.); and
- Personal protective equipment, clothing, and hygiene products should be free of PFAS (e.g., fluoropolymer linings used on Tyvek, Nomex, and Viton materials, GoreTex linings, water resistant/waterproof/stain resistant treatments, sunblock, insect repellents, cosmetics/hand creams, food packaging protective of water and grease). All equipment, materials, supplies and clothing used during field activities must be PFC-free in accordance with the guidelines presented below.

Standard operating procedure for PFAS sampling will be submitted for WDNR review and approval.

4.4 Data Assessment

QA review of all data will be conducted and documented before the data are reported in any way other than the original laboratory reports.

4.4.1 Laboratory Data Review and Validation

Laboratory QA review will be conducted in accordance with the laboratory Quality Assurance Plan (QAP).

4.5 Anticipated Schedule and Reporting

It is expected that the Starkweather Creek dye test and monitoring will be completed within one month of plan approval, subject to the occurrence of qualifying Creek flow as described above.

The televising of the storm sewer segments will be completed within three months of plan approval.

5.0 Fire Fighting Training Areas; Darwin and Pearson Street Sites

The investigation to date has indicated the presence of soil and groundwater samples collected at both FFTAs. Further investigation is needed to evaluate whether those areas are impacting the Creek. The WI ANG remedial investigation process (RI) will further characterize the contamination in those areas. The RI will utilize High Resolution Site Characterization (HRSC) technology to investigate the subsurface heterogeneities for determining exposure pathways, processes affecting PFAS fate, and mass distribution. The HRSC data will provide essential information to develop a remedial approach and understand how remedial measures will affect the current state. The Airport will work with other responsible parties to evaluate whether data from the WI ANG RI process suggests the need for additional interim actions. If it does, the responsible parties will evaluate an interim action, likely using the BAM technology based on the ongoing studies discussed in section 3.3 above.

6.0 Interim Action Implementation Timeline

The following is an anticipated implementation timeline for the interim actions assuming WDNR approval by the end of April 2021:

- Televising Identified Sections of Storm Sewer System – May 2021
- Conduct Dye Test and PFAS Sampling in Starkweather Creek – May and June 2021
- Identify Storm Sewer Defects and Recommended Restoration – June 2021
- Complete Implement Storm Sewer Restoration – October 2021
- Conduct Post Restoration Sampling of Outfalls 021 and 032 for PFAS – November and December 2021
- Maintain BAM booms at current location

APPENDIX A. Airport Property Map

