



November 21, 2019

Via Email

Mike Schmoller, Project Manager
Remediation & Redevelopment Program
State of Wisconsin
Department of Natural Resources
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Subject: DNR BRRTS Activity #02-13-584369 and 02-13-584472 – Status of response actions

Dear Mr. Schmoller:

Dane County Regional Airport (the Airport) is providing this summary of our progress to date on the two above-referenced sites and planned future actions relative to initiating field investigations as described in Department of Natural Resource (Department) letters dated October 7, 2019 and October 11, 2019 for BRRTS Activity 02-13-584369 and 02-13-584472 respectively.

As recommended by the Department in both letters, the Airport has retained Mead & Hunt, Inc. (Mead & Hunt) who is leading a technical team that is comprised of environmental experts with the experience to undertake the required investigations. In the letter of October 7, 2019, the Department identified the Airport as a potential responsible party based on PFAS compounds detected in Starkweather Creek surface water samples. That letter does not state the basis upon which the Department has linked the Airport to those results. While we acknowledge PFAS has been found in the Airport's storm water system, the Department's correspondence and separate BRRTs site assignments show that it is currently treating the storm water contamination as a separate source from the burn pits and the WANG-115th Fighter Wing- site, BRRTS # 02-13-581254. What is the basis for the Department's finding in the October 7, 2019 letter that the Airport is a responsible party for the Starkweather Creek contamination?

As the required steps are essentially the same in both letters; Mead & Hunt suggested that the Airport provide a single response for the two BRRT activities which is provided below.



Required Steps

The Airport responds to the Department's directions in each letter as follows:

Public Participation and Notification:

In response to the directions in the October 7, 2019 letter, the County worked in cooperation with the other potentially responsible parties to prepare signs and resident letters. Those items were submitted by the City on behalf of the group and are currently under review. The group will also be issuing a public notice.

Immediate Actions: Submit documentation of any immediate actions needed to halt and minimize harmful effects and their outcomes within 45 days after receipt of the letter.

The County's Corporation Counsel has reviewed the immediate actions rule in Wis. Adm. Code § NR 708.05 and concluded that it does not apply under the circumstances. That rule was designed to address acute situations such as active spills or fires. This is evident by the rule structure and language. The rule categorizes events requiring immediate action into emergencies and non-emergencies. Emergencies are defined as sites posing an "imminent threat." § NR 708.05(2). Similarly, the fourth criterion defining non-emergencies set forth factors that are relevant to an active spill such as the duration of the discharge, time until containment and weather conditions. See §§ NR 708.05(3)(b)4 and 708.09(1).

Interim Actions: Submit an evaluation within 60 days of the need for interim action to mitigate and treat PFAS-contaminated groundwater and surface water.

The Airport and its consultant are in the process of evaluating this issue in accordance with § NR 708.11. This evaluation will be submitted concurrently with the Draft Work Plan described below.

Action: Prepare and submit a draft site investigation work plan within 60 days after receipt of the letter.

The Airport and its consultant are preparing a single investigation work plan with a focused phased approach to most effectively and efficiently identify potential PFAS sources on the Airport. The work plan will consist of two initial tasks.

The first task is sampling and analysis of all accessible storm water outfalls at the Airport. They will be assessed for integrity and samples will be obtained at



key manholes and/or catch basins to aid in identifying areas of "illicit discharges" of PFAS chemicals into the stormwater system.

The second and concurrent task is the collection of previously prepared environmental and geotechnical reports for the airport and WANG. A thorough review of this data will be made to determine if the quality is sufficient to utilize in source identification in the storm water system and former burn pit areas. The report information will be summarized and used in conjunction with results of Task 1 to further define the Next Steps, which are source identification and investigations.

The work plan for the investigation as described above will comply with the requirements in Wis. Admin. Code Chapter NR 716 and any illicit discharge protocols. The work plan will include evaluation of potential interim actions that may be identified during the investigation to contain or stabilize PFAS. The Airport intends to submit a draft work plan by December 6, 2019.

Please let me know if you have any questions on the above.

A handwritten signature in black ink, appearing to read "Michael J. Kirchner".

Michael J. Kirchner, P.E.
Director of Engineering

CC:

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