

Rhinelanders/Oneida County Airport

Matthew J. Leitner, Director
Sherrie L. Williamson, Assistant Director

www.flyrhinelander.com

August 2, 2019

State of Wisconsin
Department of Natural Resources
Attn: Carrie Stoltz, Hydrogeologist
107 Sutliff Avenue
Rhinelanders, WI 54501

RE: Contamination Detected (Municipal Well #7), Rhinelanders, Wisconsin WDNR
BRRTS #02-44-584094

Dear Ms. Stoltz:

I am writing this letter in response to your written inquiry dated July 25, 2019 pertaining to PFAS detected in Rhinelanders's Municipal Well #7. In order to collect the information your office requested, I examined files and documents for the past 25 years (beginning 1/1994) and conducted several interviews with both current and former employees of the Rhinelanders-Oneida County Airport Authority, including my predecessor as Airport Director. To address your letter in a comprehensive fashion I'm going to bifurcate mine and begin with hazardous material spills on airport property and then explain our use of firefighting foam (AFFF). Please note I'm only including instances and narrative germane to Rhinelanders-Oneida County Airport property.

The only documented hazardous material at the Rhinelanders-Oneida County Airport occurred on December 21, 1994. Approximately 150 gallons of Jet A fuel were inadvertently released on the general aviation ramp located on the east side of the airport (diagram, incident report and photographs enclosed). The Wisconsin Department of Natural Resources assumed jurisdiction of the site and 52.6 tons of petroleum impacted soils were subsequently released to the Oneida

County Solid Waste Department and treated pursuant to the letters dated October 8, 1996 and June 10, 2002, which I've included. This incident was deemed "closed" by the Wisconsin Department of Commerce, Environmental and Regulatory Services on May 7, 2002 (letter enclosed).

Regarding our use of firefighting foam (AFFF) I wish to state emphatically and unequivocally that this is something we use very judiciously and sparingly. Since 1994 there have been no instances of AFFF being deployed for an aircraft incident or accident. To the best of our collective knowledge and documented Airport history, AFFF has never been utilized during an emergency situation. The Federal Aviation Administration (FAA) requires AFFF to be tested for optimal concentration on an annual basis and the Airport assumes responsibility for conducting these tests. This test is different from our FAA-mandated annual "live burn" training during which Airport, city and volunteer fire personnel use water to extinguish fires generated by propane. Firefighting foam is never used at the Airport for the purposes of training or practice.

An AFFF test entails the following procedure: Approximately 2-4 gallons are released from the fire truck's front-mounted turret and a random sample is analyzed using a refractometer. The test occurs on the terminal ramp proximate to the Airport's fire station. AFFF not collected on the ramp is released to the nearest storm water drain which is coupled to Rhinelander's wastewater treatment facility.

The Airport's current firefighting vehicle holds 200 gallons of AFFF and was acquired June 2014. An additional 200 gallons of unexpired AFFF are held in containers located within the Airport's fire station (picture enclosed). Used or expired AFFF is held in a large container at the Airport's fire station (picture enclosed).

To elucidate the Airport's reluctance to use AFFF both current and past is to note firefighting foam has a shelf life of 20-25 years and is extremely expensive, at least in the context of our budget. If the Airport were required to refill its firefighting truck with AFFF, it would cost approximately \$9,000. Furthermore, the FAA recognizes that airport fire trucks are limited in terms of service life (10-12 years) and old vehicles are supplanted with new ones before the AFFF has to be changed. In other words, the foam outlives the truck and this has held true for our Airport during the course of the last several decades.

Please let me know if you should require further information. We look forward to the continuation of a productive and cordial relationship with the Wisconsin Department of Natural Resources and extend our gratitude for the opportunity to respond.

Respectfully,

A handwritten signature in black ink, appearing to read "M. Leitner". The signature is fluid and cursive, with the first letter "M" being particularly large and stylized.

Matthew J. Leitner

Airport Director



ENVIRONMENTAL & REGULATORY SERVICES
BUREAU OF PECFA
P.O. Box 8044
Madison, Wisconsin 53708-8044
TDD #: (608) 264-8777
Fax #: (608) 267-1381
<http://www.commerce.state.wi.us>
<http://www.wisconsin.gov>
Scott McCallum, Governor
Philip Edw. Albert, Secretary

June 10, 2002

Joe Brauer
Rhineland Oneida County Airport
3375 Airport Rd
Rhineland, WI 54501

RE: **Final Closure**

Commerce # 54501-9178-00-B **WDNR BRRTS # 02-44-000592**
Rhineland-Oneida County Airport, 3400 Airport Rd, Rhineland

Spill; approximately 150 gallons of Jet "A" Fuel spilled December 21, 1994

Dear Mr. Brauer:

This letter acknowledges receipt of the information requested in the Wisconsin Department of Commerce's (Commerce) March 28, 2002 additional information letter. On May 7, 2002, Commerce received the disposal documentation for the petroleum contaminated sand and oil dry used to absorb jet fuel spilled on the subject site in December of 1994. This site was transferred from Department of Natural Resources jurisdiction to Commerce jurisdiction on June 1, 1996.

This site is now listed as "closed" on the Commerce database. It is in your best interest to keep all documentation related to the remediation of this spill.

If future site conditions indicate that any remaining contamination poses a threat, and subsequent information indicates a need to reopen this case, any original claim under the PECFA fund would also reopen and you may apply for assistance to the extent of remaining eligibility. If contamination is encountered, appropriate measures must be implemented to assure any residual contamination is managed following all applicable State of Wisconsin regulations and standards.

Thank you for your efforts to protect Wisconsin's environment. If you have any questions, please contact me in writing at the letterhead address or by telephone at (608) 261-2515.

Sincerely,

A handwritten signature in black ink, appearing to read 'David E. Blair', written over a light blue horizontal line.

David E. Blair
Hydrogeologist
Site Review Section

cc: Brenda Halminiak, Sand Creek Consultants, Inc.
Charles Turner, Rhineland Flying Service
Case File

ONEIDA COUNTY SOLID WASTE DEPARTMENT

7450 Co. Hwy K

P.O. BOX 400

Rhineland, WI 54501

(715) 282-6003 FAX (715) 282-4943

October 8, 1996

Rhineland - Oneida County Airport
Attn: Joe Brauer
3375 Airport Rd.
Rhineland, WI 54501

Dear Joe,

This letter is to verify the receipt of 52.6 tons of petroleum impacted soils from the Rhineland - Oneida County Airport property during the month of September, 1996. The soil was delivered on the 12th of September, 1996 and placed in the Oneida County Biopile, WDNR license number 2805.

Upon completion of treatment and receipt of test results, a certificate of treatment will be issued for these soils.

If you have any questions, please contact me at the landfill. Thanks much for your business!

Sincerely,



Bart Sexton

Oneida County Solid Waste Administrator

cc. Frank Sonderman

RHINELANDER/ONEIDA COUNTY AIRPORT

IRREGULARITY/INCIDENT REPORT

Date: 12/21/94 Time: 09:30
 Air Carrier A/C #: _____
 Private A/C Type: _____
 Other: Fuel Spill Flt. No.: _____
 No. of Crew: 1
 No. of Pax: _____

DETAILED EXPLANATION OF IRREGULARITY/INCIDENT:

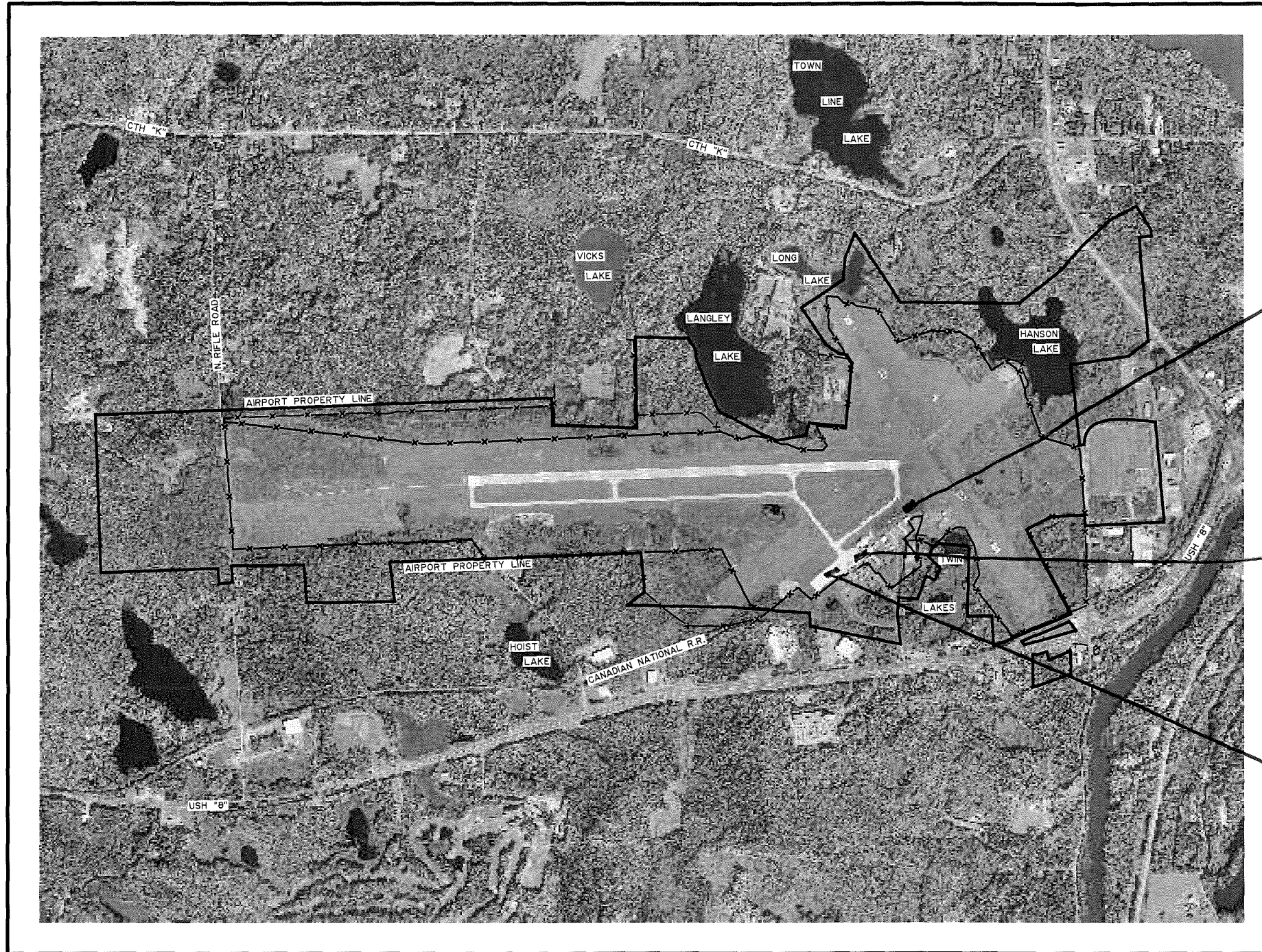
at 05:25 I noticed the fuel was low in the truck and pulled up to the pump and started fueling. I noticed Kirk was here for a 6:00 am departure so I shut down, and went to tow Kirks plane out of the shop. When Kirk wasn't ready I went back and fed the deadmans switch through the window so I could sit in the passenger seat and fuel. I don't know how much time passed before I noticed fuel running on the ground. I immediately stopped fueling and disconnected. I took the fuel truck to maint. and told Mike I had spilled fuel. We immediately came back down and started spreading oil dry and sand to stop the spread of fuel.

Please continue on back if necessary.

Submitted by: Jim Javeukoski
 Title: Line technician

Jim Javeukoski

RHI Airport



SITE OF
FUEL
SPILL
12/1994

AIRPORT
FIRE
STATION

TERMINAL
RAMP

FUEL Spill
RHI Airport
12/21/1994



AFFF STORAGE
RHI Airport 8/2019





Used AFFF
PHI Airport
8/2019