



January 21, 2021

Mayor Satya Rhodes-Conway
City of Madison
210 Martin Luther King Jr. Blvd. Room #403
Madison, WI 53703

Re: Interim Action Plan for Treating PFAS contaminated water in Starkweather Creek: BRRTs # 02-13-584369

Dear Mayor Rhodes-Conway:

The Department of Natural Resources (DNR) is directing the responsible parties for the BRRTs #02-13-584369, to implement an interim action under Wis. Admin. Code § NR 708.11 to prevent PFAS contamination in the surface water of Starkweather Creek from leaving the Dane County Airport property. A plan for the design and implementation of this interim action must be submitted to the DNR by April 16, 2021.

Background:

Firefighting training activities have caused per and poly fluoroalkyl substance (PFAS) contamination of soil and groundwater at the Dane County Airport. Data collected by Dane County in 2020 shows that PFAS contamination is present in water in the stormwater collection system. The airport stormwater system drains into surface water streams located along the south and west sides of the airport, and the south and east sides of the airport. These surface waters are Starkweather Creek.

Sampling of Starkweather Creek by DNR in 2019 from within the boundaries of the airport found elevated levels of PFAS in the creek. Additional sampling of Starkweather Creek by DNR between the airport boundaries and Lake Monona show that PFAS from the airport is reaching and causing measurable concentrations of PFAS in the creek and the lake. Concentrations of PFAS have caused a fish consumption advisory for certain fish in Lake Monona.

DNR recognizes that Dane County has implemented a pilot treatment system on behalf of the responsible parties at one of the stormwater outfalls in order to treat PFAS before it is discharged to Starkweather Creek and appreciates these efforts. DNR understands, however, that there are logistical problems with implementing the treatment media in the outfall structure and thus the treatment process has not proven to be successful in reducing PFAS concentrations from leaving the outfall and entering the surface water. If the County has data which indicates the pilot treatment system is working as intended, the DNR has requested the County submit that to DNR for review.

Action Required:

Wis. Stat. § 292.11(3) requires persons who possess or control a hazardous substance discharge, or who caused the discharge of a hazardous substance (the “responsible party or parties”) to take actions necessary to restore the

environment to the extent practicable and minimize the harmful effects of the discharge to air, lands and waters of the state.

Wis. Admin. Code § NR 708.11 requires responsible parties to take an interim action where necessary to contain a discharge of a hazardous substance in order to minimize any threat to public health, safety, welfare or the environment.

The DNR is requiring the responsible parties to develop a plan for designing and implementing an interim action for removing PFAS from the surface water of Starkweather Creek prior to the creek leaving the airport property (e.g., a treatment system). The interim action plan must be submitted to the DNR by April 16, 2021 and must include a date by which the interim action will be implemented.

Questions regarding the project can be directed to Steve Ales at stephenm.ales@wisconsin.gov and 608-400-9187.

Sincerely,



Christine Haag, Director
Remediation & Redevelopment Program

Cc: Steve Ales – RR Program, GEF 2
Steve Martin – SCR
Darsi Foss – Division Administrator, DNR
Madison & Dane County Public Health
Brita Kilburg-Basnyat – DHS