



March 10, 2021

Lt. Colonel Mike Dunlap
Wisconsin Air National Guard; 115CES/CRIE
Dane County Regional Airport
3110 Mitchell Street, Building 1210
Madison, WI 53704

Subject: Approval of Materials Management Plan for F-35 Apron Repair; Wisconsin Air National Guard 115CES/CEIE, Dane County Regional Airport, Madison.
BRRTs #02-13-585319

Dear Lt. Colonel Dunlap:

The Wisconsin Department of Natural Resources (DNR) received a Materials Management Plan (MMP) for Apron Repair at the Wisconsin Air National Guard (WANG) base located at Truax Field in Madison. The MMP was sent to the DNR on February 25, 2021.

The Apron Repair area is located to the north-northwest of Building 404 and Building 406. This area needs repair/modification to prepare the base for the arrival of F-35 aircraft in 2023.

Soil and groundwater samples were collected from four (4) locations through the existing apron to the northwest of Buildings 404 and 406. Samples were collected from 1-2 feet below grade, and then just above the water table. A duplicate sample was collected at one location (TR20-02). Groundwater samples were collected from temporary wells in the boreholes and represent groundwater near the top of the saturated zone. All samples were analyzed for Volatile Organic Compounds (VOCs) and for Per and Poly-fluoroalkyl Substances (PFAS). Samples results were included in the February 25, 2021 submittal.

Soil Analytical Results

VOCs were detected in soil at one location (TR20-01) in the 3'-5' depth. These concentrations were below levels of regulatory concern.

PFAS compounds were detected in all four soil borings with borings TR20-02 & TR20-03 detecting the largest number of PFAS compounds. PFOS was found in all soil samples with concentrations ranging from 0.38 (J) ug/kg to 36 ug/kg. Other PFAS compounds were at lesser concentrations.

Soil Management

WANG's MMP indicates that all soil excavated and removed as part of this project will be managed as a solid waste will be transported and disposed in a licensed solid waste landfill. In addition, this project will require that the existing base course material be recompacted prior to placing the new concrete apron. Base course and sub grade materials that are not suitable for reuse will be taken to a solid waste landfill. This is an appropriate method for handling excess soil and base course material. Solid waste landfills in Wisconsin make the decision as to which wastes, they will and will not accept. WANG will need to arrange with the landfill for accepting the material. If an alternative method of soil management is desired, WANG must discuss the proposed management alternative with DNR prior to implementing.

Groundwater Analytical Results

Six (6) different VOCs were found in groundwater in two of the four soil borings, all at very low levels. No VOCs exceeded NR 140 Preventive Action Limits.

Groundwater Management

Wisconsin currently does not have promulgated groundwater quality standards for any PFAS compounds. Fifteen (15) different PFAS compounds were detected in groundwater from the four sampling locations with sample location TR20-03 showing the greatest number of compounds (14) present and with the highest concentrations. These samples indicate groundwater is highly contaminated with PFAS compounds and five (5) of the compounds exceed recommended Preventive Action Limits and or Enforcement Standards from the Department of Health Services.

Groundwater dewatering is not anticipated for this construction project. This is based on depth to water from the borings completed at this location, and from experience WANG has gained from other construction project WANG has completed in the past. As such, DNR understands that WANG does not intend to seek a wastewater discharge permit ahead of construction activities. If groundwater is encountered the MMP stated the water will be containerized and sampled, and WANG will work with the DNR to review options for disposing the water based on sampling results.

Approval

The Materials Management Plan is approved subject to the following conditions:

1. Management of excavated soil in conformance with the approved materials management plan shall be completed within one year of the effective date of this letter unless a written extension of this condition is obtained from the DNR.
2. The Wisconsin Air National Guard shall manage excavated material in conformance with the approved materials management plan and shall notify the DNR within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the DNR or if there are visual or olfactory indications of a contaminant discharge. That material must be segregated and tested to determine appropriate disposal options.
3. If areas of unanticipated soil contamination or discovery of underground storage tanks, piping, drums, etc. are encountered, the DNR shall be notified within 24 hours and appropriate actions to investigate, evaluate and deal with the situation shall be proposed. Notification of discharge shall be submitted to the Department in accordance with s. NR 706.05(1).
4. The Wisconsin Air National Guard is responsible for obtaining any local, federal or other applicable state permits to carry out this project. If more than one acre of land is disturbed, a stormwater permit may be required. Contact the DNR's Stormwater Manager to determine what, if any, permit is needed.
5. The Wisconsin Air National Guard shall comply with requirements of s. NR 718.12(2)(d) and (e) Wis. Adm. Code as needed or appropriate.
6. The Wisconsin Air National Guard shall submit a documentation report to the DNR within 90 days of substantial completion of the redevelopment project. The report shall contain the following items:
 - a. As-built drawings documenting compliance with the above conditions of approval;
 - b. A narrative description of how the above conditions were accomplished including relevant documentation;
 - c. Color photographs documenting construction aspects addressed in this approval; and
 - d. Documentation of excavation and soil placement activities. The report shall include the description of the total volume and final location/disposition of relocated material.
 - e.

The DNR reserves the right to require the submittal of additional information or to modify or revoke this MMP approval if the Wisconsin Air National Guard fails to comply with the requirements of the proposed MMP. The

DNR also retains its right to modify or revoke this approval if circumstances or conditions change, or if new information is found which would warrant modification or revocation of this approval.

If you have any questions regarding this approval please contact Steve Ales at stephenm.ales@wisconsin.gov or 608-400-9187.

Sincerely,

A handwritten signature in blue ink, appearing to read "St L Martin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Steven L. Martin, P.G.

South Central Region Team Supervisor
Remediation & Redevelopment Program

Cc: Steve Ales – Remediation & Redevelopment Program