WISCONSIN AIR NATIONAL GUARD
HEADQUARTERS 115TH FIGHTER WING (ACC) (ANG)
3110 MITCHELL STREET
MADISON WISCONSIN 53704-2529

11 April 2021

MEMORANDUM FOR WISCONSIN DEPARTMENT OF NATURAL RESOURCES

FROM: 115 CES/CC

SUBJECT: XGFG182008 F-35 Alter B406 – Materials Management Plan
BRRTS #: 02-13-585319

1. Pursuant to Wisconsin Administrative Code NR 700 a materials management plan is required for materials that could/will be removed that contain contaminants of concern. On 26 February 2020, WI DNR provided to the 115 FW a Site Characterization Sampling Plan for contaminated material management purposes for the subject project. This memorandum serves as the material management plan that the 115 FW plans to follow while constructing the subject project. This material management plan will detail plans for water and soil that have the potential to contain contaminants of concern.

2. **Site Soil Results** – From eleven sample locations at six sites, four sample locations had some concentration of perfluorinated compounds. Two sample locations had PFOS concentrations of 0.525 ng/g to 2.820 ng/g. One sample location had a PFAS concentration of 0.821 ng/g. A concentration of Acetone was detected at one site as a result of VOC sampling. The concentration of 1.97 mg/kg is above the LOD and below the LOQ. A complete summary of all data is found within Attachment 1, B406 Sampling Report 21 December 2020.

3. **Site Soil Handling and Disposition** – All soil excavated and removed as a condition of this project for the installation of foundations, utilities, grading, etc. will be removed and managed as a solid waste by placement in a Subtitle D solid waste landfill. Over-excavation backfill will be accomplished using existing soils removed during excavation. All excess material will be landfilled and not allowed to be sold/used on other construction sites. The construction site will be provided with clean topsoil and seeded at the end of construction. For the areas not being seeded, the remainder of the site will be covered w/ an impervious surface (ie concrete, asphalt, etc).

4. **Site Water Results** – A review of the six sample locations indicate that perfluorinated compounds are present at each of the groundwater sample locations. Fifteen different perfluorinated compounds were detected of the thirty-six investigated in varying amounts across the site. The largest contributors, and most likely to be regulated in the future, PFOS amounts ranged from 7.64 ng/L to 70.6 ng/L (average 43.31 ng/L). PFOA amounts ranged from 2.86 to 44.7 ng/L (average 17.718 ng/L). Five different VOCs were detected at two sites with concentrations of cis-1,2-Dichloroethene, Tetrachloroethene, Toluene, trans-1,2-Dichloroethene, and Trichloroethene. A complete summary of all data is found within Attachment 1, B406 Sampling Report 21 December 2020.

5. **Site Water Handling and Disposition** -
For the subject project site, dewatering of the project is not anticipated to be required based upon site investigation, boring logs, PFOS testing, and project drawings. There does remain the potential that dewatering could become necessary while installing utilities to the site. Given the level of the water table and known construction elevations, a dewatering permit to allow discharge of PFOS containing water will not be obtained. If during construction it becomes clear that constructing around infiltrating groundwater is not possible (assuming groundwater infiltrates), the water will be removed, placed in a container and not discharged until either a) a proper WPDES dewatering permit can be obtained or b) is allowed to be discharged to the Madison Metropolitan Sewer District (in which case WI NR 200.03 (3) (a) would apply).

6. The above and attached is the 115th Fighter Wing's approach to material management for construction project: XGFG182008 F-35 Alter B406, BRRTS #: 02-13-585319 at Truax. If you have any additional questions, please feel free to contact me at 608-286-0010 or michael.dunlap@us.af.mil at any time. Thank you in advance for your review of this material management plan.

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MICHAEL J. DUNLAP, Lt Col, WI ANG
Commander, 115th Civil Engineer Squadron
Base Civil Engineer

Attachment:
1. B406 Sampling Report 21 December 2020