

Foellmi, Thomas J - DNR

From: Ales, Stephen M -DNR
Sent: Monday, February 7, 2022 4:27 PM
To: Dunlap, Mike J - DMA
Cc: HINMAN, MICHAEL T GS-12 USAF ANG 115 CES/Architect; Shaw, Matthew - DMA; Ross, Issac A - DNR; Ales, Stephen M -DNR
Subject: MMP for the perimeter fence

Mike:

On January 9, 2022 and January 12, 2022 Mike Hinman submitted a materials management plan (MMP) and soil data collected for the perimeter fence project. The DNR tracks this project in BRRTs under tracking # 02-13-585319. Soil samples were collected from a depth of 1'-2' at a spacing of approximately every 200' along the expected length of the fence of approximately 3100'. Soil samples were analyzed for PFAS compounds and some PFAS compounds were detected in 13 of 16 sampling locations. PFOS was the most frequently detected compound and was found at all 13 locations where PFAS compounds were detected.

Your MMP requested permission to thinly spread soil removed from a fence footing location on to the ground and seed the area to establish and then maintain a grassy surface. The DNR is denying this request.

WANG must follow the Materials Management Plan (MMP) that was approved by the DNR on July 21, 2021. The MMP allows that soil that doesn't contain PFAS compound may be segregated from that soil containing PFAS compounds. Soil without PFAS compounds may be used as clean fill either in on site projects, or, taken from the WANG base and used at another location. Soil containing PFAS compounds is to be placed where groundwater presently contains PFAS compounds and it is to be placed at a location of a planned impervious surface (i.e., under a building, asphalt, or concrete) as part of an F-35 construction project or other construction site at the WANG base.

The approved MMP also allows soil containing PFAS compounds to be temporarily placed in the open space to the west of building 1209. Soil from the perimeter fence project may be placed west of building 1209 until a location is selected for final placement. The DNR recognizes space at this location may become limited. I am out of the office the next two weeks but when I return let's discuss ideas for handling that soil, and other soil generated during future WANG construction projects.

Groundwater was not encountered during this sampling event. This project is not expected to encounter groundwater or to require dewatering for the new fence to be constructed. If field conditions or the construction technique changes, and it is necessary to lower the water table to complete this project then WANG must contact the DNR prior to starting construction to determine a proper method for containing and treating water.

Let me know if you have any questions.

Steve

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Stephen M. Ales, P.G.

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