

Submitted PFAS Questions 8/19/20 – 9/2/20

Q: We understand the Air National Guard is planning construction activities soon to begin basing the F-35 jets. During construction, any digging will involve removing near-surface water from the construction sites. What will be done with this de-watering to assure safe release? Will it be properly treated to remove PFAS and other chemicals? To what standards will it be cleaned before releasing? Will it be released to Starkweather Creek? And how soon does the construction begin? Thanks!

A: The County understands that the WI DNR is regulating construction in contaminated areas. The Guard has indicated that they will work with the WI DNR on all construction projects. Further questions about this issue should be addressed to the WI ANG. You can contact the Wisconsin National Guard Public Affairs office by emailing ngwi.pao@mail.mil or calling (608) 242-3050

Q: You discuss efforts to characterize and control the PFAS contamination being conveyed through the airport stormwater system, which is quite important. But with the very shallow groundwater levels in this area, PFAS are no doubt continuously moving into the groundwater and surface waters, notably Starkweather Creek. What efforts are being made to determine and control this ongoing source of PFAS into our drinking water and lakes?

A: Current efforts include continued sampling of stormwater and a pilot mitigation program that is designed to treat water exiting the stormwater system. That system will include treatment of groundwater that infiltrates the storm system. The County is currently in the process of conducting a thorough investigation to determine the locations and extent of the contamination in all pathways and will hire a remediation contractor to lead the cleanup efforts based on the outcome of the investigation.

Q: Fed Ex is planning a construction project on airport grounds soon. As stated by the contractor in an August 11 2020 letter to the DNR, "The Phase II EA included groundwater tests that confirmed the existence of both perfluorooctanoic acid ("PFOA") and perfluorooctanesulfonic ("PFOS"). The contractor has also submitted a "Notice of Discharge" for PFOA and PFOS for the project. Will the water from dewatering the construction sites be properly tested and treated to remove PFAS and other hazardous chemicals before discharge into surface waters? Will a DNR permit for these activities be obtained and available for public review?

A: We cannot speak on behalf of FedEx or its construction contractors. Details of the construction as it relates to PFAS can be found on the [WI DNR BRRTS website](#).

Q: Once a question is submitted, what happens? Will questions and your responses appear on this website? Or do you reserve the right to not to respond to questions? I ask this question in light of:

- **Who benefits? Who is burdened?**
- **Who does not have a voice at the table?**
- **How can policymakers mitigate unintended consequences?**
- **Not answering all submitted questions online on this webpage would seem to be counter to the above.**

A: After questions are submitted, they are subject to legal review and then answered to the best of our current knowledge. These questions and responses will be displayed on the airport's PFAS Information Page. The County will not answer questions about topics that may be the subject of potential litigation.

Q: Will the county be taking legal action against manufacturers of PFAS containing products similar to the State of Michigan to reclaim the costs of investigation and cleanup of the PFAS contamination? See: <https://www.mlive.com/public-interest/2020/08/michigan-claims-pfas-makers-concealed-firefighting-foam-danger-in-new-lawsuits.html>

A: As this is a subject of potential litigation, the County will not comment.

Q: Will the county stop the Air National Guard from any construction at its base until a complete investigation determining the extent of the PFAS contamination has been completed?

A: The County does not regulate the Guard's construction activities.

Q: Can the county provide a map that shows the full extent of the PFAS contamination around the airport?

A: There is a detailed map of sample points and detected PFAS concentrations on the BRRTS website.
<https://dnr.wi.gov/botw/GetActivityDetail.do?adn=0213584472&siteId=2235700&crumb=1&search=b>

Q: Madison residents continue to be exposed to PFAS in the groundwater, Starkweather Creek and Lake Monona. Will the county provide offer free health screenings to determine the level of PFAS in the bloodstreams of residents?

A: The County does not have plans to offer health screenings. Individuals are subject to exposure to PFAS compounds through a wide variety of sources unrelated to the airport. PFAS are in a multitude of everyday items, a list of which can be found in the EPA link in the Additional Resources section.

Q: Will the county add a fee on the cost of airlines tickets to the county airport to help fund a complete investigation and cleanup of the PFAS contamination cause by airport operations?

A: Neither the county nor the airport determines the price of airline tickets. The investigation and cleanup of PFAS are currently being funded through airport revenues.

Q: When will the county finish a complete investigation to determine the full extent of PFAS contamination caused by airport operations?

A: PFAS is an evolving issue and investigation is an ongoing process. There is not a current projection on when the investigation will be completed. We have already completed a large amount of testing, but more testing is needed to fully understand the issue at hand.

Q: When will the PFAS polluted areas be cleaned up, including the groundwater?

A: We first need to complete our investigation and receive further guidance on the requirements for remediation of PFAS contamination. We currently do not have an estimation of clean up completion.

Q: How was this PFAS comment period advertised to the affected community? Why were residents in the affected areas not directly notified, by the airport itself, of this public comment period availability and the airport/ANG's connection to PFAS contamination in the water supply and local bodies of water?

A: This webpage was created to inform the public and create an interactive way for the public to provide questions and input to the airport. This is the first step in an ongoing process to receive the public's questions, comments, and input. This question submission portal was announced through a press release sent to local news agencies and county board members.

Q: Why hasn't the airport and/or ANG done more to clean up the PFAS contamination yet? Why has it taken multiple warnings and threats of lawsuits from the WI DNR for anyone to look seriously at cleanup and remediation at this location?

A: The Dane County Regional Airport continues to take PFAS contamination seriously. The science behind PFAS, as well as the testing and cleanup technologies, are relatively new and are still evolving. There are many unresolved issues, including the legal requirements and guidelines for cleanup. Additionally, there are limited available options for large-scale PFAS remediation, and all of them require field investigations and engineering analyses to be implemented. The County has installed a pilot treatment system on one priority storm sewer to evaluate its performance and determine if it might be worth scaling up and installing elsewhere. The results from the evaluation are not in yet. Our consultants are also actively investigating new emerging remediation technologies to see if they might be useful at the Airport. We have, and will continue to work side by side with the WI DNR, WI ANG, and the City of Madison to resolve this issue and to develop the best solution for our airport and community.

Q: What mitigation will be provided to individuals in the areas with contaminated water? Based on the airport/ANG's long history of contaminating the water here with PFAS, how can residents be assured that we are not being exposed to other potentially toxic chemicals courtesy of the airport? At what cost to the city and/or taxpayers will cleanup and remediation be provided?

A: A study conducted by Madison Water Utility found that no municipal drinking water wells in the entire City of Madison are over the EPA or State of Wisconsin advisory guideline for PFOA & PFOS. The airport and the WI ANG follow all legal guidelines for regulated substances including use, disposal, and possible spills. We have responded accordingly to new practices and guidelines as they have been released.

Q: What has the airport's role been in regards to the PFAS contamination and what is the airport's plan to remediate the current contamination and mitigate further contamination from occurring.

A: You can learn more about the Airport's role in contamination, investigation, and mitigation/remediation in the video presentation and the PDF document above.

Q: When will you be cleaning up the PFAS?

A: We have started a pilot project to test the effectiveness of a new technology for removing PFAS from stormwater and we will be evaluating its potential for use in overall remediation. Upon completion of the County's PFAS investigation, we will hire a remediation contractor to lead cleanup work on the airfield based on the applicable legal standards and requirements.

Q: Is the airport going to clean up its own on-site source of PFAS contamination (that's all over the city, really) before the ANG expansion/construction begins? And if not, who is? Is anyone? And when, please?

A: It is important to understand that PFAS across Madison comes from a multitude of sources. Even contamination around the airport does not derive exclusively from the airport. You can learn more about where PFAS is coming from on the EPA's informational page linked in the Additional Resources section. You can read the previous responses and information on this page to learn more about the investigation, mitigation, and remediation of PFAS.

Q: DNR NR 716 rules require full delineation of the vertical and horizontal extents of the groundwater contamination onsite (and offsite if necessary). Has DCRA assessed the horizontal and vertical extents of the groundwater PFAS contamination at the DCRA site? If not, why not and when will it do so?

A: All work plans can be found on [the BRRTS website](#). Work plans include the entire scope of work planned. All work plans have been approved by the DNR. In addition, contamination detected in the stormwater system is subject to regulation under the Ch. NR 216, Wis. Admin. Code.

Q: In addition to fully delineating contamination onsite, DNR's NR 716 rules also require investigating the extent of contamination offsite if necessary, including down migration pathways such as Starkweather Creek. Has DCRA assessed PFAS in sediments in Starkweather Creek at the airport site or downstream of it as it flows through Truax Field (owned by the County) and further downstream? If not, why not?

A: All work plans can be found on [the BRRTS website](#). Work plans include the entire scope of work planned. All work plans have been approved by the DNR.

Q: The two likely PFAS-contaminated burn pits (Darwin Rd., Pearson St.) are on Dane County Airport property. Why aren't they included in DCRA's stormwater permit (which expired in 2019 but hasn't yet been renewed)? Will they be included in the new permit, when issued?

A: The historical burn pits are not part of the DCRA stormwater system and are therefore not covered in a stormwater permit.

Q: The FAQ says "Q: Are the fire training areas a source of PFAS contamination? A: We don't know at this time. Investigation of the soils and groundwater in the area of the former burn pits is currently underway." DNR first sent a responsible party letter to Dane County for the burn pits over two years ago, and again on October 7, 2019. The Oct. 7 2019 letter refers explicitly to "historic burn pits on or adjacent to the airport property where AFFF fire-fighting foam has been used for many years." Clearly DNR believes that PFAS was likely used at these burn pits. Why hasn't any PFAS data been gathered from soils and groundwater at these burn pits yet—years after responsible party letters were sent asking for PFAS investigations?

A: Investigation of the two historic burn pits is currently underway following a DNR-approved work plan and will soon be completed. The use of the burn pits and the use of AFFF on the burn pits is currently being investigated.

Q: The FAQ says: “Q: Was the DCRA cell phone lot constructed over the Darwin Street fire training area? A: The evidence to date indicates the answer is no. The County of Dane (County) and its partners are currently investigating the Darwin Street fire training area, which is located near the cell phone lot.” If this is the case, why does the June 1, 2017, Mead & Hunt, Application for WETLAND PERMIT for the cell phone parking lot project say on pg. 4 explicitly that this area was used as a burn pit, as well as a “waste and borrow site and stockpile area for airport improvements”—which would also very likely indicate that the area is contaminated?

A: The permit was issued for the parcel of land that contained both the cell phone lot and the historic burn pit. The burn pit is believed to be in relatively close proximity, but not under the lot. Any known waste or hazardous material at the airport is handled and disposed of properly, responsibly, and in compliance with applicable laws.

Q: Soils have been moved around at the airport on numerous occasions (e.g., when Starkweather Creek was re-routed, during various construction projects, and used as fill in various locations at the airport). Has DCRA tested PFAS soils and groundwater in the areas at the airport where these likely contaminated soils and wastes have been transported? If so, can DCRA share maps and data? If not, why not?

A: The County is working in cooperation with DNR to address the presence of PFAS contamination at the airport and will take appropriate actions based on the applicable legal standards and requirements. The airport has always followed applicable laws in the planning and execution of construction activities. Any future plans for testing will be available on [the BRRTS website](#).

Q: The FAQ says: “Q: Is the WI ANG working with the County to clean up the Airport site? A: Yes. The County is working in cooperation with the WI ANG and City of Madison. The County is leading several concurrent activities to address the PFAS contamination discovered at and near the Airport and meeting regularly with the WDNR to develop plans to address PFAS at the Airport.” Can DCRA please share which county, DNR, and other government employees participate in these meetings and where the public can obtain notes from these meetings?

A: The meetings mentioned above are not public meetings. These meetings are primarily used for planning and discussion between the entities involved. When public comment and questions submission is available, it will be announced on this webpage.

Q: Truax ANG is a co-permittee on DCRA's stormwater permit. The permit says "Dane County, as the owner and airport authority, shall act as the airport representative and shall coordinate co-permittee efforts to achieve permit compliance." The PFAS in stormwater systems at the airport are certainly at least in part from the high levels of PFAS in the shallow soil and groundwater at the Truax base. Truax ANG has not met the NR700 requirements outlined in a letter over two years ago to fully investigate the PFAS at the base. What is DCRA doing to demand that its co-permittee follow DNR laws and investigate the extent of PFAS in soils and groundwater at the base, which clearly contribute to the contamination in the DCRA storm drain system?

A: All co-permittees are complying with the stormwater permit. An investigation into PFAS contamination is underway following a DNR-approved work plan. The WI ANG and the Airport are following all of the necessary steps outlined by the WI DNR.

Q: In the video Dr. Meritas says that AFFF is the only source of PFAS at the airport. Mr. Meritas and airport management know that there are other PFAS sources at airports such as industrial components in aviation and aerospace. DCRA and Mead and Hunt also know that contaminated soils have been moved around at the airport many times over the decades (Starkweather Creek was re-routed at various times, soils from the burn pit area were moved, wastes were piled in the burn pit area, etc.). Can DCRA please correct this information on the FAQ page?

A: PFAS contamination is ubiquitous in the environment. PFAS is found in a multitude of everyday items and industrial items, so to say there is only one source here at the airfield is not accurate. That being said, the vast majority of the measurable contamination associated with the airfield is believed to be AFFF. PFAS contamination is also believed to be coming from additional sources surrounding the airfield. Investigation of these sources is still underway.