

## **PRP Letters**

- In March 2019 the National Guard Bureau received the results of a Phase 1 inspection for perfluorinated compounds (a.k.a. PFAS) of the Truax Field Air National Guard Base.
- The Phase I Base inspection included soil and groundwater sampling that found exceedances in the USEPA lifetime drinking water Health Advisory for PFOA and PFOS in groundwater and exceedances of the US Air Force soil screening level for PFOA.
- In October 2019, DNR notified three parties they believe are responsible for PFAS contamination in Starkweather Creek. Those parties are Dane County, the City of Madison and Air National Guard.
- Also in October 2019, DNR notified Dane County that it was liable for PFAS levels detected in the Airport storm water system.
- The suspected source of PFAS contamination in the vicinity of the Airport is the past use of firefighting foam known as aqueous film-forming foam, or (AFFF).
- Dane County Airport contracts with the Air National Guard for its firefighting services. Therefore, the County has no reason to believe that county employees have ever handled the AFFF foam.
- The Federal Aviation Administration requires airport firefighting services to use AFFF in firefighting training and emergencies because of its superior ability to extinguish fires started by jet fuel, gasoline, and other petroleum based chemicals – to save lives.
- Congress set a three-year deadline for the federal government to come up with a replacement foam that is PFAS-free. We're currently in year two of three of that deadline and are required to use the current foam if there is an emergency.
- Historically, the firefighting training occurred on the Truax Field Air National Guard Base. The Air National Guard has advised the County that it is no longer conducting training at Truax Field and has moved its training activities to Volk Field in Juneau County. Thus, the only new discharge of firefighting foam containing PFAS at the Airport would be in the event of an emergency.
- In the October notices, DNR set deadlines for the County and other responsible parties to take certain specific actions to proceed with investigation of PFAS contamination. Dane County has met all those deadlines.
- At this stage of the process, the County has hired a consultant, Mead & Hunt, which has a nationwide perspective on PFAS issues at Airports.
- In early December (12/6/19) Mead & Hunt submitted a proposed work plan in accordance with DNR deadlines. The plan includes further sampling of the Airport storm water system to determine the source that is discharging PFAS into the storm

water system and additional investigation into the historic Airport operations that are relevant to PFAS use.

- Since the County's consultant submitted the proposed work plan, DNR has released the results of additional sampling of Starkweather Creek in the Airport vicinity (1/15/20).
- The County's consultant submitted a revised work plan that factors the new information into the investigation process. (2/4/20) Sampling activities set forth in the work plan are underway.
- The process of investigation occurs in steps. At each step the sampling will further define where PFAS is located and where in the ground it is coming from.
- Understanding where the PFAS source or sources are located is an essential step to proper planning for how to respond.

### **PFAS General Comments**

- The County is committed to working with local, regional, and national partners to address PFAS. It is essential that all agencies work together toward the best solution for Dane County residents for PFAS mitigation at the Airport.
- We are working with the Department of Natural Resources (DNR), the Air National Guard, and the City of Madison to address this as quickly as possible.
- We don't have all the answers yet, but we are committed to letting the science guide us to the best solution. Understanding where the PFAS source or sources are located is an essential step to proper planning for how to respond.
- The County has hired Mead & Hunt, a national expert consultant on PFAS issues at airports, and submitted a plan to the DNR. DNR has approved it so we will start our investigation and mitigation efforts immediately.
- As we get more information, we will make any adjustments needed as we work with our partners to coordinate efforts to tackle the contamination from the Truax site.
- Dane County, the City of Madison and the Air National Guard have worked together to place warning signs and update fish consumption advisories as well as using other public notice processes.

### **Planned Comments re. Public Engagement Process**

- The County has been working with the other responsible parties to install and update signage along Starkweather Creek about PFAS risks and fish advisories and to send letters to affected residents.

- The Airport is in the process of developing a webpage to keep the public informed about its PFAS investigation and response processes.
- The Airport will be scheduling a public informational meeting in approximately mid-March with updates on the final work plan and work activities underway.