

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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April 28, 2021

Sent Via E-Mail

Mr. Mike Kirchner
Director of Engineering
Dane County Regional Airport
4000 International Lane
Madison, WI 53704

Subject: Proposed Interim Action Plan for PFAS Contamination of Starkweather Creek at Dane County Regional Airport, BRRTs #02-13-584369 and 02-13-584472

Dear Mr. Kirchner:

On April 16, 2021 the Wisconsin Department of Natural Resources received your report outlining the proposed interim remedial actions to be taken by Dane County, the City of Madison, and the Wisconsin Air National Guard to address the movement of PFAS compounds from the Dane County Regional Airport via Starkweather Creek. The report was prepared by Mead & Hunt.

The report mentions contamination from three source areas within the airport boundaries. These are the former fire training areas at Darwin Road, the former fire training area at Pearson Street, and the PFAS present in the stormwater system servicing the airport. The Mead & Hunt report indicates that the upcoming Remedial Investigation to be completed by the Wisconsin Air National Guard and the National Guard Bureau will include both the former fire training areas on Darwin Road and Pearson Street. The primary focus of the April 16, 2021 report was to identify interim actions to reduce PFAS loading from the stormwater system to Starkweather Creek.

The proposed interim actions outlined in the April 16, 2021 document are **approved**, subject to the conditions presented later in this letter.

Proposed Actions

Two primary tasks are proposed to address the stormwater system.

- Task 1 – Locate the specific areas where PFAS contaminated groundwater is entering the stormwater pipes through leaky/broken pipes, loose joints, etc. Once identified, these areas will be remediated to stop the infiltration through techniques such as re-lining the pipe, replacing/repairing broken pipes, grouting leaking joints, and other remedial measures as needed. In addition, the County will continue operating their pilot test of the BAM treatment technology at Outfall 21.
- Task 2 – Complete additional sampling of Starkweather Creek to better define the distribution and concentrations of PFAS in the creek in locations within and just downstream of the airport boundary. A dye test will be completed on Starkweather Creek in the area immediately south of the airport to gain a better understanding of the mixing of two streams on airport property and how it affects measurements of PFAS in the creek. There will be sampling of the surface water in Starkweather Creek prior to, and after, the investigative and repair work on the stormwater

system has been completed to determine the efficacy of the repair work in reducing PFAS concentrations.

Conditions of Approval

The dye test to determine the proper monitoring location of Starkweather Creek south of the airport will involve placing rhodamine dye into the stream and then watching where it becomes fully mixed into the stream. Starkweather Creek is a public water body and therefore WPDES General Permit WI-0066575 for Low Impact Discharges will be needed prior to completing the test. To obtain the permit you should contact Trevor Moen at 920-410-5192 and Trevor.Moen@wisconsin.gov. Mr. Moen will be able to guide you through the steps for obtaining this general permit.

The Department appreciates the efforts by Dane County, the City of Madison, and the Wisconsin Air National Guard to implement these remedial measures to address the PFAS contamination leaving the airport property through Starkweather Creek. Should you have any questions regarding this approval please contact Steve Ales at 608-400-9187 or stephenm.ales@wisconsin.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "St L Martin".

Steven L. Martin, P.G.
Remediation & Redevelopment Team Supervisor
South Central Region

Cc: Steve Ales – Remediation & Redevelopment Program (sent via E-mail)
Trevor Moen – Wastewater Program (sent via E-mail)
Christie Baumel – City of Madison (sent via E-mail)
Lt. Col. Dan Statz – Wisconsin Air National Guard (sent via E-mail)