



March 13, 2020

Col. Kevin Philpot
Vice Wing Commander
Wisconsin Air National Guard
2400 Wright Street
Madison, WI 53708

Subject: Response Action Requirements – Wisconsin Air National Guard-Truax Field, BRRTs #02-13-581254

Dear Col. Philpot:

On February 3, 2020, the Wisconsin Department of Natural Resources (DNR) met with representatives from the Wisconsin Air National Guard (WANG), Dane County, Dane County Airport and the City of Madison to discuss the results of investigation into PFAS contamination at Truax Field (Truax) and Starkweather Creek and the status of additional required work. **The following information is being provided per your request at the February 3, 2020 meeting.** At this meeting, you requested clarification regarding requirements for environmental investigation and remediation for the per and polyfluoroalkyl substances (PFAS) contamination at Truax.

Data collected by WANG and submitted to the DNR shows there have been discharges of PFAS to the environment at the WANG base located at Truax Field. Due to the discharges of a hazardous substance and the presence of environmental pollution, WANG is required under Wis. Stat. ch. 292 to conduct a site investigation, and as needed, implement interim and remedial actions to minimize the effects to the environment. On November 18, 2019, DNR staff met with representatives of WANG regarding WANG's responsibility under Wis. Stat. ch. 292. During that meeting, DNR staff explained the need for WANG to take immediate actions to address the environmental impacts from the PFAS discharge and resultant environmental pollution. At that meeting WANG agreed:

“that within 60 days, WANG would retain a consultant to prepare a workplan. The workplan should include soil, sediment, surface water and groundwater investigations as well as incorporate immediate actions to address PFAS impacted groundwater leaving the site to the west and southeast.”

A full summary of the meeting and actions to be taken by WANG was sent to Major General Dunbar on December 2, 2019.

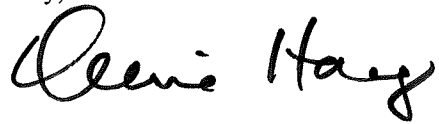
DNR has not received notification from WANG that it has retained a qualified environmental consultant, nor has DNR received a workplan. Due to the ongoing discharges and impacts from environmental pollution from the WANG facility, WANG is out of compliance with state law and the DNR expects the following:

- By May 4, 2020 WANG will submit a site investigation workplan to the DNR for determining the degree and extent of PFAS contamination from WANG.
- By August 17, 2020, WANG will submit to the DNR the results of the site investigation and plan for proposed interim remedial actions to stop the ongoing contaminant discharge of PFAS contamination from the WANG facility.
- By November 30, 2020, WANG will have in place and operating the DNR-approved response actions to eliminate the discharge of PFAS contaminants and environmental pollution to the Starkweather Creek watershed from the contaminated groundwater known to exist beneath Truax. This includes mitigating and treating stormwater runoff and groundwater migration into surface waters and off-site of the Truax property.

These actions shall comply with the requirements of Wis. Stat. ch. 292 and shall be conducted in accordance with the provisions of Wis. Admin. Code chs. NR 700-754. This work shall be completed by a Wis. Admin. Code ch. NR 712 qualified environmental consultant.

I hope this clarifies WANG responsibilities in this matter. If you have further questions, please contact DNR project manager Michael Schmoller at 608-275-3303.

Sincerely,

A handwritten signature in black ink that reads "Christine Haag". The signature is written in a cursive, flowing style.

Christine Haag
Director, Remediation & Redevelopment Program

Cc: Beth Bier – AD/8
Darsi Foss – AD/8
Mike Schmoller – SCR
Steve Martin – SCR
Phil Bower – LS/8