



July 2, 2018

SENT VIA E-MAIL

Ms. Maria Powell, PhD
President,
Midwest Environmental Justice Organization (MEJO)

Subject: Response to Requests and Inquiries Regarding Sites in Madison, Wisconsin

Dear Ms. Powell:

This letter responds to several of your recent requests/inquiries to the Department of Natural Resources (DNR) regarding potential contamination associated with Truax Field and the nearby Truax Landfill in Madison. A summary of MEJO's requests/inquiries are followed by DNR responses and presented below:

MEJO Inquiry #1 - E-mail from Maria Powell to DNR on April 18th, 2018 at 8:59 a.m.; Subject: Vapor Intrusion Around Landfills

You indicated that based on reports submitted to DNR, the Dane County Truax Landfill south of the airport has had VOC detections (PCE, TCE, VC) above the Wis. Admin. Code ch. NR 140 groundwater PAL and/or ES since the late 1980s (if not earlier). You also stated that the former Burke Sewage Treatment plant (now the Reyco property), which is located just south of the landfill, received a VI letter in 2011. You went on to point out that there are businesses, homes, and a pre-school adjacent to this landfill. You asked if the DNR has assessed the potential for vapor intrusion at/near this site.

DNR Response:

DNR staff from the Remediation and Redevelopment (R&R) Program as well as the Waste and Materials Management (WMM) Program reviewed the files for each of these sites relative to the issue of vapor migration. A summary of our assessment of the file information for each site is as follows:

REYCO/ Burke WWTP Site (BRRTS No. 02-13-3157730)

- This was a former WWTP plant, located on Town of Burke property - adjacent to the Truax Landfill - and operated by the City of Madison (MMSD) for treatment of domestic sewage (1914-1950) and by Oscar Mayer for treatment of industrial wastewater (1951-1978). Operations were discontinued in 1978.
- A number of on-site sludge drying lagoons were used in the treatment operations. Sampling and analysis of samples of wastewater sludge from the lagoons was performed in 1992. Only trace concentrations of volatile organic compounds (VOCs) were detected.
- In 2002, a limited site investigation was performed at the site that included advancing 16 Geoprobe borings and collecting soil, ground water and vapor (methane) samples for analysis of

potential constituents of concern, including VOCs. No VOCs were detected in soil or ground water.

- Four ground water monitoring wells were historically installed at site as part of a more comprehensive monitoring network associated with the adjacent Truax Landfill. No VOCs have been detected in these wells.
- Based on this information and documented site use, it does not appear that this site is a potential source for VOCs in soil, ground water or soil vapor that would result in a vapor intrusion issue based on current land use at the site and in the vicinity.

Truax Landfill

- There have been no groundwater enforcement standard (ES) exceedances for VOCs at any of the monitored monitoring wells at the Truax Landfill in the past 10 years
- The only preventive action limit (PAL) exceedances for VOCs in the last 5 years have been at the MW-12 nest.
- Based on this information, the only buildings that could potentially be at risk, as related to vapor intrusion, would be in proximity to the MW-12 well nest.
- However, the depth to groundwater in this area, as measured at the MW-12 well nest, is slightly greater than 30 feet.
- All 4 of the buildings in that area are constructed to a City of Madison Building Code specification for gas proofing buildings built near landfills.
- This gas proofing also acts to prevent vapor intrusion.
- The landfill has an operating active gas extraction system to remove gas from the landfill and provide an inward gas/vapor gradient at the landfill, which also reduces the potential for vapor migration.
- Based on this information, vapor intrusion into buildings adjacent to the Truax Landfill appears to be highly unlikely.
- The buildings adjacent to the Truax Landfill site do not meet the minimum criteria for requiring vapor intrusion monitoring (based on US EPA and DNR guidance) based on the site characteristics and VOC concentrations described above.

MEJO Inquiry#2: E-mail from Maria Powell to DNR on May 24, 2018; Subject: PFAS in Burke WWTP Sludge

In this e-mail, you sent an excerpt from the 1988 Truax report that identified a number of constituents in soil and ground water samples. The list of constituents contained a number of fluorinated ethane and fluorinated methane compounds. You suggested that these were polyfluorinated compounds (PFCs) and that they may provide evidence of PFCs in the Truax Landfill or the sludge associated with the REYCO/Burke WWTP site. [Please note that the US EPA and the DNR have adopted the term Per and Polyfluoroalkyl Substances (PFAS) for this class of chemicals].

DNR Response:

The fluorinated compounds identified in this study are not PFAS. They are primarily refrigerants (forms of Freon) and are chemically very different than PFAS and provide no indication for the presence or

absence of PFAS. In addition, it would have been a very unique investigation to have sampled for PFAS compounds in the late 1980's.

MEJO Inquiry #3: Letter Sent Via E-Mail from Maria Powell to DNR on June 5, 2018; Subject: PFAS at Truax Field

In this letter, you pointed out that significant levels of PFAS were found in shallow soils and ground water at the Truax Air National Guard Base (Truax ANG site) as summarized in a recent (March 27, 2018) draft site investigation report commissioned by the Department of Defense (DOD). You indicated that storm water from the base drains into Starkweather Creek, which eventually discharges into Lake Monona. You commended the DNR for requiring the ANG to perform additional testing of soil and ground water in the area for PFAS. However, you pointed out that DNR did not explicitly request testing of surface water or sediments. You requested that DNR ask the ANG to do the following:

1. Test water and sediments near Truax ANG base outfalls to Starkweather Creek for PFAS.
2. Test water, sediments, and fish in Starkweather Creek downstream of the Truax ANG base for PFAS.
3. Include maps accurately depicting Starkweather Creek in relation to Truax ANG base in reports.

You also requested that we contact our stormwater program and inform them of the soil and groundwater PFAS contamination at the Truax ANG site, and work with the ANG and Dane County to include appropriate management and ongoing stormwater testing for PFAS in the DCRA/ANG WPDES permit and Stormwater Pollution Prevention Plan (SWPPP).

DNR Response:

As you know, many site investigations are performed in an iterative manner. We intend to require testing of surface water and sediment for PFAS at the Truax ANG site. We are initially concentrating efforts on investigating and characterizing PFAS in soils and ground water. Once the nature and extent of PFCs in these media are better defined, we will be in a better position to more accurately determine appropriate locations for surface water and sediment sampling. You should also note that the need to perform surface water and sediment sampling will be formally communicated to ANG in the very near future (they are aware of the need for this sampling and they are in agreement with the concept).

MEJO Inquiry #4 : E-mail from Maria Powell to DNR on May 9, 2018; Subject: Former Burn Pit, Truax Field, Darwin and International Drive

In this e-mail, you indicated that you observed that this former burn pit area was being excavated to build a parking lot. You asked if this burn pit area was ever remediated or if the soils, groundwater, surface water or sediments in and around this area were ever tested for PFAS or other contaminants.

DNR Response:

In consultation with Dane County Airport engineering staff, we have evidence that shows that the ongoing construction of the parking area you alluded to is to the north of the former burn pit area. We have also checked our files and determined that no remediation has been performed in this area and no testing of PFAS has been conducted. We have issued a potentially responsible party letter to the Dane

County Airport, the City of Madison and the ANG requesting that the site be investigated and, if necessary, remediated.

We thank you for your questions and comments and we hope the above responses address your concerns. Please feel free to contact me with any additional questions or comments via telephone at 608-275-3310 or via e-mail at StevenL.Martin@wisconsin.gov. If you would like a meeting to discuss this letter, please let us know.

Sincerely,



Steven L. Martin, P. G.

South Central Region Team Supervisor
Remediation and Redevelopment Program

cc: Darsi Foss, CO/RR
Steve Ales, CO/RR