



Office of the Mayor

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November 28, 2018

Captain Matthew Shaw
Wisconsin Air National Guard, 115th Fighter Wing
Dane County Regional Airport, Truax Field
3110 Mitchell St, Building 1210
Madison, WI 53704-2529

Dear Captain Shaw,

I am writing to follow up on the meeting you had last fall with City staff, and with your more recent correspondence with Madison Water Utility Water Quality Manager Joe Grande regarding per- and polyfluoroalkyl substances (PFAS).

The Madison community wants PFAS-free drinking water. The PFAS contamination at Madison municipal well #15 more than likely originated at Truax Field. PFAS, unlike other ground and drinking water pollutants including volatile organics, come from a limited number of principal sources - manufacturing facilities, manufacturing waste disposal sites, and fire-fighting & training activities involving AFFF. While the level of PFAS currently detected at the municipal well is not considered a threat to human health, I am concerned that, as the contaminant plume moves through the aquifer, PFAS levels may rise to a level of human and environmental health concern.

An investigation into potential PFAS releases at Truax Field previously identified significant soil and shallow groundwater contamination at several Potential Release Locations (PRLs) and in two Temporary Wells located at the base boundary. Madison Well 15 is located less than one mile from the WI Air National Guard base at Truax Field. Groundwater modeling conducted by the Madison Water Utility demonstrates that travel times from identified PRLs and base boundary wells to Well 15 are shorter than the time period of likely PFAS releases on the site, suggesting that contamination from the base may be the source of PFAS in the municipal drinking water well.

PFAS are known to be highly mobile and persistent; they do not naturally break down once in the environment. Because the PFAS investigation has not been expanded beyond the base boundary, the extent of PFAS contamination, both laterally and at depth, and the potential long-term impact to Well 15 cannot be assessed. On behalf of the residents of

the City of Madison, I have a number of questions. Are the observed PFOA & PFOS concentrations at Well 15 representative of a leading edge of the contaminant plume? Are there greater impacts likely in the near future, or is the PFAS contamination at an advanced stage of impact?

In addition to ground and drinking water impacts, to my knowledge, the Guard has not initiated any testing of the surrounding stormwater channels that drain into Starkweather Creek. The creek could serve as a transport pathway for PFAS to Well 15 or act as another human exposure route through consumption of fish derived from this creek.

The City of Madison requests that the 115th Fighter Wing, WI Air National Guard, prioritize further study of PFAS migration off the base and initiate environmental remediation at the confirmed PFAS release sites previously identified at Truax Field. Existing evidence suggests that PFAS contamination from Truax Field is affecting a public water supply well that delivers nearly 400 million gallons annually to our community.

Specifically, the City of Madison asks that the WI Air National Guard,

- Expand the future investigation to include offsite groundwater monitoring to the southeast, the direction of groundwater flow and Well 15, and include well nests to detect potential shallow and/or deep contaminant migration pathways.
- Include surface water (i.e. Starkweather Creek) and sediment testing in the next phase of the investigation.
- For water samples, subject them to analysis by *modified EPA Method 537*, or similar method, to include analysis of *at least twelve PFAS*, including all six Unregulated Contaminant Monitoring Rule (UCMR) Round 3 contaminants, with reporting limits of *2 nanogram per liter* (ng/L) or lower for each PFAS analyzed.
- Begin the investigation and environmental restoration immediately and without delay to protect the public, including the most vulnerable, from potential harmful health effects of PFAS in drinking water.
- Evaluate treatment alternatives and implement water treatment to provide PFAS-free water to City of Madison residents served by Madison Well 15.

I understand that the Guard is taking appropriate action to prevent future PFAS releases to the environment, and I appreciate that effort. Still, I would like to see more action on known PFAS contamination that has migrated off-site. Are you able to share a work plan involving the scope of work needed for this project? Has the Department of Defense provided the proper budget allocation that this undertaking will need? Clearly, it will take some time to develop and implement plans for an investigation and subsequent

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remediation. The sooner this work can begin the better. I look forward to hearing from you soon.

Sincerely,

Paul R. Soglin
Mayor

cc: Mike Schmoller, Wisconsin DNR
Samba Baldeh, Common Council President