

TIMELINE OF ACTIONS

TRUAX FIELD – 115TH FIGHTER WING

Throughout the 1970-1980's, the Air Force used C8-chain Aqueous Film Forming Foam (AFFF), also known as legacy foam. Per Federal Aviation Administration (FAA) requirements at the time, it was the mandated substance used in firefighting foam at the 115th Fighter Wing (FW) to extinguish jet fuel aircraft fires.

Since April 1990, the 115 FW has shared a cooperative relationship with the Dane County Regional Airport (DCRA), serving as a first responder for military and civilian aircraft fire emergencies at Truax Field.

In 2015, National Guard Bureau (NGB) announced to stop testing legacy C8-based AFFF foam at all military installations across the United States. The 115 FW had already began retrofitting several buildings to a high expansion foam system from 2006 to 2010, with the final building being retrofitted in 2017 to a C6-AFFF system. C6-AFFF is a more environmental-friendly substitute to the legacy C8-based AFFF foam. In 2018, this system was shut off out of an overabundance of caution to ensure no accidental releases occurred.

In addition, all 115 FW fire trucks were drained and rinsed of legacy AFFF and disposed of through the Defense Logistics Agency (DLA) disposal service in 2016. The fire trucks were refilled with Air Force approved C6-based AFFF foam

Training with the C6-based AFFF is not allowed locally. To ensure proper functioning of vehicles a closed loop testing apparatus is attached to the fire truck. C6-based AFFF is only dispensed in emergency situations where fire is involved or imminent. After the fire hazard is neutralized, the site is treated and reported as a hazmat spill.

The 115 FW continues to work closely with the Wisconsin Department of Natural Resources (DNR), the City of Madison and the Dane County Regional Airport to implement measures that will further the goal of PFAS-related remediation.

Additional Facts:

- Drinking water on Truax Field is provided by two wells operated by the Madison Municipal Water Utility and both have been determined to be safe for human consumption and meets all requirements of the Safe Drinking Water Act.
- **1968 – Present:** Fire departments nationwide are mandated to store and use C8-based AFFF to respond to aircraft fires per FAA Part 139 regulations. During this timeframe multiple agencies were responsible for fire protection at DCRA to include the City of Madison Fire Department (June 15, 1968 – December 31,

1975), JJ Protective Services (January 1, 1976 – April 1990) and the 115 FW (April 1990 – present).

- **August 2015:** NGB eliminated testing aircraft rescue and firefighting vehicles with AFFF on all military installations.
- **May 2016:** Environmental Protection Agency (EPA) establishes a health advisory for perfluorooctane sulfonate (PFOS)/ perfluorooctanoic acid (PFOA) at 70 parts per trillion in drinking water.
- **Fall 2016:** 115 FW aircraft rescue and firefighting vehicles are drained and rinsed of legacy AFFF and disposed of through the Defense Logistics Agency (DLA). The trucks are refilled with a more environmentally friendly C6-based AFFF.
- **November 2017:** NGB funded Site Inspection (SI) conducted – temporary wells installed and sampled, and soil borings collected. The SI is step #2 in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process which the 115 FW is mandated to follow.
- **April 2018:** Draft site inspection report is received and the 115 FW is issued “Responsible Party” letter from WI DNR.
- **May 2018:** WI DNR requests additional testing at two off-base fire training areas. The 115 FW attempts to fund sampling/testing of these fire training areas, however federal procurement laws prevent this since the training areas are not on Truax Field property.
- **September 2018:** 115 FW receives draft site inspection for review. The unit works with WI DNR, the City of Madison, Department of Health Services, and Madison Water Utility to discuss clean-up plans and WI DNR expectations.
- **April 2019:** Final site inspection complete with recommendation for a Remedial Investigation (RI), step #3 in the CERCLA process.
- **May 2019-May 2020:** 115 FW collaborates with WI DNR to determine PFOS sampling locations for material management plans in order to satisfy NR700 requirements for F-35 construction. To date, over 115 sampling locations and \$450,000 has been expended to enable this effort.
- **February 2020:** 115 FW meets with personnel from the WI DNR, Department of Health Services, Dane County Regional Airport, and City of Madison to discuss PFAS and WI DNR expectations for work and media management plans at the 115 FW.

- **September 2020:** NGB announces funding for a Remedial Investigation and an off-base Drinking Water Assessment for Truax Field. The contract is awarded to EA Engineering based in Lincoln, NE.
- **February 2021:** Kick-off coordination meetings for the RI and off-base Drinking Water Assessment contract occurred.
- **May 2021:** Pilot study initiated with ORIN Technologies to remediate PFAS impacted water. After five weeks, the four 200 gallon totes experienced an average PFAS reduction rate of 93.6% for PFOS and 100% for PFOA. At the conclusion of the 15-week pilot study, the average reduction rate for PFOS increased to 99.4%.
- **June 2021:** Bay West LLC completed a Drinking Water Assessment on an off base private well. Results of the assessment indicate the levels of PFOS and PFOA were well below the Environmental Protection Agency's (EPA) health advisory level. No further action by the federal government is required.
- **October 2021:** The 115 FW and DCRA commission a pilot study with ORIN Technologies for a Pilot Scale Injection project. This year-long study will to seek to treat PFAS impacted groundwater in a 1,600 square foot area adjacent to the base Fire Department. This pilot project was reviewed and approved by the Department of Natural Resources Division of Environmental Management, Remediation and Redevelopment Program.
- **January 2022:** The FW, NGB, and EA Engineering held an Open House at Madison College on January 11 to provide the general public with an overview of the upcoming Remedial Investigation. In addition the Relative Risk Site Evaluation (RRSE), which is an Air Force prerequisite for the Remedial Investigation, was discussed, and the results of that evaluation are publicly available for review and comment through February 14, 2022. A recording of the event, further information and the RRSE results can be found at <https://ng.wi.gov/pfas>.
- **February 2022:** The scope of work for the Remedial Investigation (RI) is approved by the WI DNR. Mobilization 1 is scheduled to begin March 23, 2022. Mobilization 2, which will include the installation of multiple monitoring wells, is scheduled to begin in August 2022.

CERCLA Process

