

PFAS RESPONSE & ACTIONS

WISCONSIN ARMY NATIONAL GUARD

Perfluorooctanesulfonic acid (PFOS) and Perfluorooctanoic acid (PFOA), are two types of fluorinated organic chemical that are part of a larger group of chemicals referred to as perfluoroalkyl substances (PFAS). PFOS/PFOA are commonly used in household items such as non-stick cookware, clothing, shoes, furniture, and carpets.

Since the 1970s, the Army has been using Aqueous Film Forming Foam, a firefighting agent used to suppress fuel fires. Aqueous Film Forming Foam contains both PFOS/PFOA and is commonly used by civilian firefighters as well. The Army ceased the use of Aqueous Film Forming Foam containing PFOS/PFOA except for emergencies and is collaborating with the Navy and the rest of the Department of Defense in its assessments of substitutes for PFOS containing Aqueous Film Forming Foam.

The National Guard Bureau has reviewed the inventory of potential PFOS/PFOA source areas where PFAS-containing materials may have been used, stored, disposed, or released historically (e.g. fire training areas, aviation assets, etc.). In response to this, two Preliminary Assessments were initiated in the spring of 2019 at our Aviation Facilities located at the West Bend Airport and Dane County Regional Airport in Madison. The National Guard Bureau receives input and guidance from the Wisconsin Department of Military Affairs as it moves forward with these investigations.

Army Aviation Support Facility #2 – Madison, WI

The Wisconsin Army National Guard maintains UH-60 Blackhawks to conduct a wide array of training missions and real-world domestic operations missions in support of the National Guard's state and federal missions. The Wisconsin Army National Guard helicopters are critical components of domestic operations and supports-civil authorities including wildfire response, search and rescue, aerial observation, medical transport, and more in terrain that is remote or difficult for ground forces or civil authorities to reach. Response time for rotary assets is four hours from initial notification. The site includes aircraft hangars and facilities to conduct helicopter maintenance.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Preliminary Assessment

In 2019-2020, a Preliminary Assessment was completed for the Army Aviation Support Facility # 2 in Madison as part of the Army National Guard's nationwide effort to evaluate facilities where PFAS-containing materials may have been used, stored, disposed, or released historically. Although the Preliminary Assessment did not find evidence of PFAS release at the Army Aviation Support Facility #2, the report concluded that due to the past presence of several 60-gallon TriMax fire extinguishers at the facility, a Site Inspection phase would follow. The Wisconsin Army National Guard shared a copy of the Preliminary Assessment report with Wisconsin Department of Natural Resources.

CERCLA Site Inspection

The Site Inspection involved the collection of soil and groundwater samples with the goal of determining whether there has been a release to the environment and evaluate the presence or absence of PFAS compounds above the Office of the Secretary of Defense screening levels, dated 6 July 2022. The Wisconsin Department of Natural Resources was involved with planning this effort, which began in 2021. The field work was completed in March of 2022 and a draft report is expected in fall 2022.

Army Aviation Support Facility #1 West Bend, WI

The Wisconsin Army National Guard maintains UH-60 Blackhawks and UH-72A Lakota Light Utility Helicopters to conduct a wide array of training and real-world domestic operations support missions to include civil search-and-rescue reconnaissance, and medical rescues in terrain that is remote or difficult for ground forces to reach. Response time for rotary assets is four hours from initial notification. The site includes aircraft hangars and facilities to conduct helicopter maintenance.

CERCLA Preliminary Assessment

In 2019, a Preliminary Assessment for per- and polyfluoroalkyl substances (PFAS)-containing materials was completed for the West Bend Army Aviation Support Facility as part of the Army National Guard's nationwide effort to evaluate facilities where AFFF may have been used, stored, disposed, or released historically.

The Preliminary Assessment was completed, and the Preliminary Assessment report was shared with the Wisconsin Department of Natural Resources. The Preliminary Assessment identified two areas of interest at the Army Aviation Support Facility: fire suppression system testing area and a possible aqueous foam forming

foam release area during fire training activities (TriMax™ release).

CERCLA Site Inspection

Based on the results of the Preliminary Assessment, a Site Inspection was initiated by the Army National Guard and the Site Inspection planning documents, were prepared and shared with the Wisconsin Department of Natural Resources. Prior to starting the Site Inspection field work, a meeting was held with stakeholders to discuss the scope of the field investigation, locations and numbers of soil and groundwater samples. The Wisconsin Department of Natural Resources comments were incorporated in the overall Site Inspection scope. Preliminary results from the Site Inspection were shared with Wisconsin Department of Natural Resources in May 2021, and additional sampling was completed in December of 2021. A Site Inspection report was prepared and submitted to the Wisconsin Department of Natural Resources. The Site Inspection concluded that a Remedial Investigation phase would follow.

CERCLA Remedial Investigation

In 2022 scoping activities for the West Bend Remedial Investigation commenced. Draft work planning documents are expected in fall of 2022, and Wisconsin Department of Natural Resources will be involved in finalizing the scope of work. Remedial Investigation field activities are scheduled to begin in summer of 2023.

Drinking Water

In response to the new drinking water standards, the Army proactively implemented a comprehensive PFOS/PFOA approach to manage risk to Army Soldiers, families, and civilians from PFOS/PFOA in drinking water. In 2017, the Army completed enterprise-wide sampling of drinking water at all Army operated drinking water systems to ensure drinking water supplies meet US Environmental Protection Agency guidelines. The Army's water quality monitoring activities are ongoing.

Sawyer County - Hayward Well:

In Wisconsin, the Army National Guard operates one drinking water system, a well at the Hayward Field Maintenance Shop located in Sawyer County. The Hayward Well was sampled for PFAS in 2017, 2020 and 2022. No PFAS was found exceeding the Method Reporting Level. Potable water for most of our other facilities comes from local municipal water sources. These locations fall under the Wisconsin Department of Natural Resources and the US Environmental Protection Agency for testing requirements.