



May 7, 2018

Mr. Thomas Kaugher
AMEC Environment and Infrastructure
46850 Magellan Drive
Novi, MI 483377-2448

Subject: Draft Regional Site Investigation Report- Truax Field

Dear Mr. Kaugher:

The Department has reviewed the March 18, 2018 draft site investigation report for Truax Field. The field investigations provide a good start at determining the nature and extent of soil and groundwater impacts from perfluorinated compounds. Follow-up investigation is now needed to determine the extent of soil and groundwater impacts and provide the data to evaluate potential remedial options. Specifically, the Department believes the following work is needed: (These points are consistent with the recommendations in Table 6 of the draft report)

There needs to be additional onsite soil sampling at each of the nine potential release locations (PRLs) to determine the extent of direct contact concerns and source of groundwater impacts.

There needs to be additional onsite shallow and deep groundwater monitoring to determine the extent and movement of contaminant plumes emanating from the PRLs.

There needs to be additional offsite groundwater investigation to the southeast. Groundwater is expected to flow to the southeast and the results from the boundary wells indicate the probability of offsite impacts. Further Madison City Well 15 lies about one mile southeast of the air field. This well has shown detects of perfluorinated compounds. Off site monitoring well nests to detect shallow and/or deep contaminant migration are required.

Wisconsin Air National Guard staff are known to have used the county fire fighting training area at 1750 Pearson Street. There are concerns about perfluorinated compound impacts to the soil and groundwater at this location. Field work for this potential release area needs to be added to the workplan.

For all the required additional on and offsite investigations the Department would like to discuss the specifics of the next phase of study before a workplan is developed.

The compounds selected for investigation need justification. There is a wide range of perfluorinated compounds. A site conceptual model that incorporates past firefighting chemical use is needed to insure the correct compounds are included in the investigation.

This completes the Department's review of the draft report. The report provides a good base from which to conduct further site studies. The Department looks forward to working with the National Guard Bureau on developing and implementing additional remedial efforts.

If you have questions or concerns about this letter please contact me directly at 608-275-3303.

Sincerely,



R. Michael Schmoller
Hydrogeologist