

**From:** Lewandowski, Richard <Richard.Lewandowski@huschblackwell.com>  
**Sent:** Wednesday, January 22, 2020 3:54 PM  
**To:** Stoltz, Carrie R - DNR  
**Subject:** Ltr to Ms Stoltz re Oneida Co Airport 1.22.20"  
**Attachments:** 4834-7163-8962.1 Ltr to Ms Stoltz re Oneida Co Airport 1.22.20.pdf

Ms. Stoltz, attached please find the response by Oneida County, the City of Rhineland and the Oneida-Rhineland Airport to the DNR correspondence of December 9, 2019. The signed original will follow by regular mail.

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# HUSCH BLACKWELL

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January 22, 2020

## VIA E-MAIL AND U.S. MAIL

Carrie Stoltz  
Project Manager  
Wisconsin Department of Natural Resources  
Remediation & Redevelopment Program  
107 Sutliff Ave  
Rhineland, WI 54501

Re: Rhineland Municipal Well #7, Rhineland-Oneida County Airport,  
BRRTS #02-44-584094

Dear Ms. Stoltz:

We represent Oneida County in connection with the Department's requests concerning the Oneida County Airport. We have also been asked by the City of Rhineland and the Rhineland-Oneida County Airport to send this letter as an initial response to your letter dated December 9, 2019.

The Airport Authority has retained Mead & Hunt as its consultant to provide advice and appropriate services in connection with the December 9, 2019 letter. Rather than duplicate efforts, the City and County will also rely on Mead & Hunt for that purpose, as well. Laura Morland is the lead technical contact for this project. She is located in Mead & Hunt's Middleton, Wisconsin office. Her email is [laura.morland@meadhunt.com](mailto:laura.morland@meadhunt.com) and her telephone number is (608) 443-0608.

At the outset, we want to emphasize that the U.S. Federal Aviation Administration (FAA) requires airports with commercial flights to maintain firefighting equipment, including the availability of Aqueous Film Forming Foam (AFFF). The Rhineland-Oneida County Airport is certificated by FAA as a commercial service airport under the provisions of 14 CFR Part 139 and must follow those requirements. FAA also sets the specifications for firefighting foam. The only foams which comply with FAA mandates contain PFAS. Because the Airport offers daily commercial flights connecting Rhineland and the Minneapolis-St. Paul airport, these requirements apply to this airport.

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FAA mandates that airports with commercial flights conduct an annual test of firefighting foam. The current practice is to slowly and carefully release approximately 2 to 4 gallons of AFFF into a container, and the required tests are then performed on the foam in this container. Foam utilized in this testing is then placed into a tote and stored in an indoor location for disposal at an off site facility that is qualified to handle this material. Photographs of the tote were provided to you by Airport Director Matthew Leitner in his correspondence to DNR dated August 2, 2019.

We are continuing to review historic practices and will supplement this response if appropriate. To our knowledge, AFFF has never been used to fight a fire at the Airport.

As described in the Airport's August 2, 2019 reply to the DNR, the Airport does conduct annual "live burn" training exercises. These exercises involve putting out a real fire, but this is done using only water; firefighting foam is never and has never been utilized in these training exercises.

Analytical data suggests that PFAS variants are present at Municipal Well No. 7 at the low parts per trillion level. Well No. 7 is upgradient of the airport operational area. As a precaution, the City has shut down Well No. 7. Accordingly, the City, County and Airport Authority do not believe that immediate or interim remedial action is indicated, or practical.

The Airport, County, City and Mead & Hunt (their technical consultant) look forward to discussing this with you in more detail.

Very truly yours,



Richard J. Lewandowski

RJL:pc

cc: Matthew Leitner, Airport Director  
Brian Desmond, Oneida County Corporation Counsel  
Steve Sorenson, Acting City Attorney, Rhinelander  
Laura Morland, Mead & Hunt