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 the 1990's, the 115FW 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 115FW 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 115FW 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 115FW 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 the Madison Municipal Water Utility and has been determined to be safe for human consumption and meets all requirements of the Safe Drinking Water Act.

- **1970-1980's:** DCRA fire department is mandated to store and use C8-based AFFF to respond to aircraft per FAA regulations. During this timeframe multiple agencies were responsible for fire protection at DCRA to include the City of Madison, DCRA, and the 115FW.

- **August 2015:** NGB announces to stop testing aircraft rescue and firefighting vehicles with AFFF on all installations.

- **May 2016:** Environmental Protection Agency (EPA) stablishes a health advisory for perfluorooctane sulfonate (PFOS)/ perfluorooctanoic acid (PFOA) at 70 parts per trillion in drinking water.

- **Fall 2016:** 115FW 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.

- **Early 2017:** The only building at 115FW with legacy AFFF is replaced with compliant C6 AFFF foam.

- **November 2017:** NGB Site Inspection conducted – temporary wells installed and sampled, and soil borings conducted.

- **April 2018:** Draft site inspection report is received and the 115FW issued "Responsible Party" letter from WI DNR.

- **May 2018:** WI DNR requests additional testing at two off-base fire training areas. The 115FW attempts to fund sampling/testing of fire training areas, however federal procurement laws prevent this.

- **September 2018:** 115FW 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 an extended Site Investigation.

- **May 2019-May 2020:** 115FW collaborates with WI DNR to determine PFOS sampling locations for material management plans in order to satisfy NR700 requirements for F35 construction. To date, over 95 sampling locations and $450,000 has been expended to enable this effort.

- **February 2020:** 115FW 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 115FW.

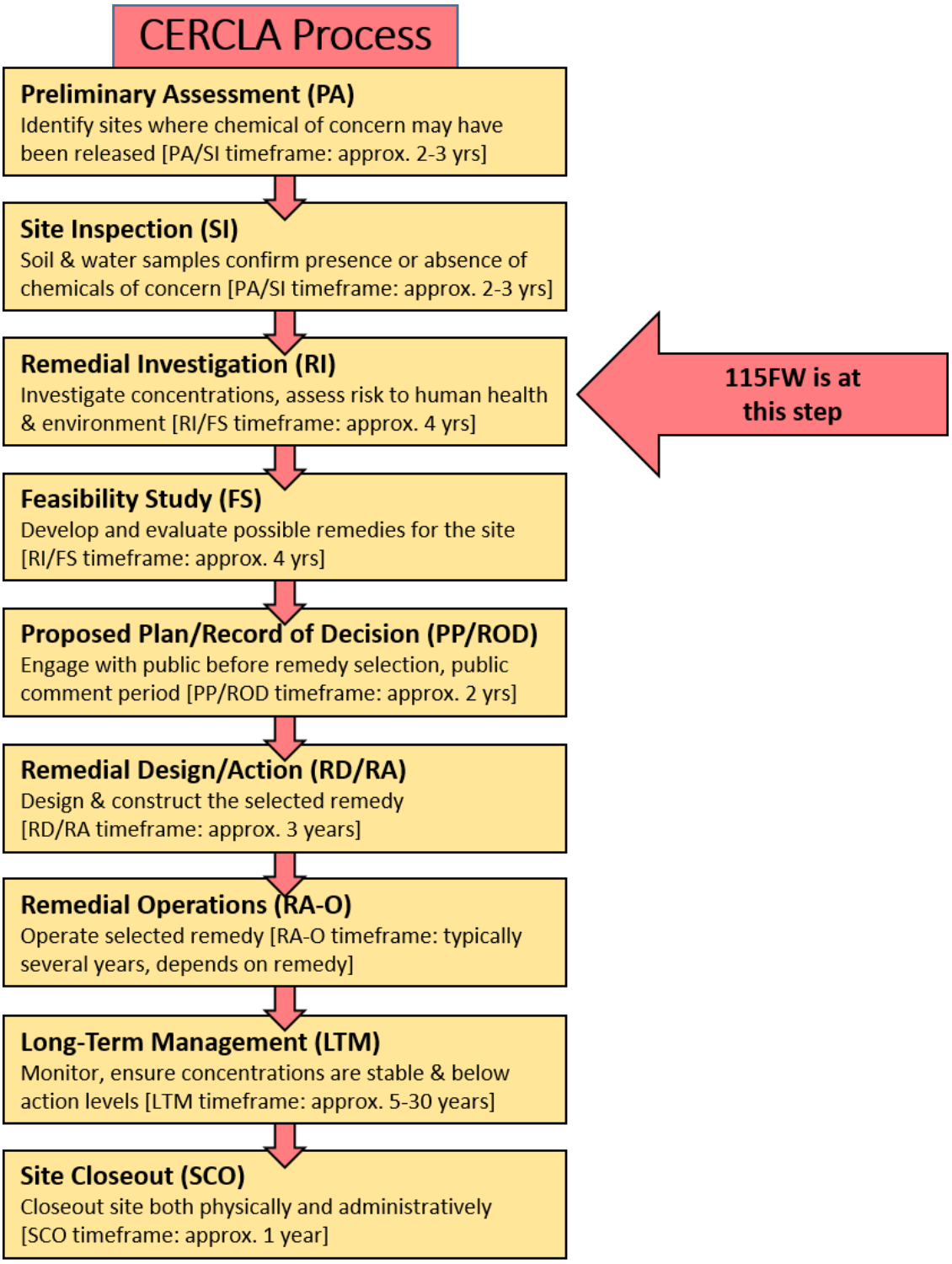
- **September 2020:** National Guard Bureau awards a Remedial Investigation for Truax Field and an off-base Drinking Water Assessment. Coordination for this work is expected to begin in 2021.

- **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.

- **October 2021:** The 115th Fighter Wing and the Dane County Regional Airport commissioned 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.


CERCLA Process
Preliminary Assessment (PA)
Identify sites where chemical of concern may have been released [PA/SI timeframe: approx. 2-3 yrs]
Site Inspection (SI)
Soil & water samples confirm presence or absence of chemicals of concern [PA/SI timeframe: approx. 2-3 yrs]
Remedial Investigation (RI)
Investigate concentrations, assess risk to human health & environment [RI/FS timeframe: approx. 4 yrs]
115FW is at this step
Feasibility Study (FS)
Develop and evaluate possible remedies for the site [RI/FS timeframe: approx. 4 yrs]
Proposed Plan/Record of Decision (PP/ROD)
Engage with public before remedy selection, public comment period [PP/ROD timeframe: approx. 2 yrs]
Remedial Design/Action (RD/RA)
Design & construct the selected remedy [RD/RA timeframe: approx. 3 years]
Remedial Operations (RA-O)
Operate selected remedy [RA-O timeframe: typically several years, depends on remedy]
Long-Term Management (LTM)
Monitor, ensure concentrations are stable & below action levels [LTM timeframe: approx. 5-30 years]
Site Closeout (SCO)
Closeout site both physically and administratively [SCO timeframe: approx. 1 year]