



## Office of the Mayor

Satya Rhodes-Conway, Mayor

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November 19, 2019

Wisconsin Department of Natural Resources  
Attn: Adam DeWeese – DG/5  
P.O. Box 7921  
101 S. Webster St.  
Madison, WI 53707-7921

RE: Proposed Water Quality Standards for PFAS in SS 089-19, SS 090-19, and SS 091-19

Dear Mr. DeWeese,

Thank you for this opportunity to comment on the proposals to revise state drinking water, groundwater, and surface water standards to include standards and monitoring requirements for poly- and perfluoroalkyl substances (PFAS).

I am writing to express my support for the development of standards. These substances are documented to pose hazards to human health and warrant a regular monitoring program, with follow-up actions informed by clear standards. I am hopeful that the standards development process will incorporate the key elements for regulatory determination listed in the federal Safe Drinking Water Act and other regulations – in short, that the standards are informed by occurrence, public health risk, treatability, and cost of treatment.

In Madison, I see a clear and immediate need for standards on the Air National Guard property at Truax Field. This is an area where high levels of PFAS contamination have been detected, and yet the Air National Guard has stated that any remediation activities will follow the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process and that Truax Field be prioritized relative to all military bases nationwide. Given that no PFAS have been designated as hazardous substances under CERCLA, I believe the possibility for a near-term remediation of the site is low.

The most promising opportunity for remediation at the Air National Guard site on Truax Field may be in conjunction with future construction at the site, which is contemplated in the draft Environmental Impact Statement to locate F-35 Fighter Jets at Truax Field. If this construction occurs, the Air National Guard would be required to obtain Wisconsin Department of Natural Resources (WDNR) approval of a material management plan prior to the start of construction, which must address the management of any soil and groundwater contamination. This is a tangible opportunity for new state PFAS standards to improve public health in Madison. Without new PFAS standards, this opportunity for environmental remediation may be at risk.

Again, thank you for this opportunity to comment. The City of Madison staff look forward to engaging

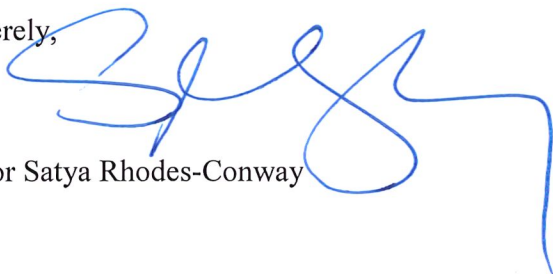
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in the standards development process. Please contact Christie Baumel at [cbaumel@cityofmadison.com](mailto:cbaumel@cityofmadison.com) with any questions.

Sincerely,

Mayor Satya Rhodes-Conway

A handwritten signature in blue ink, appearing to read 'Satya Rhodes-Conway', is written over the printed name. The signature is fluid and cursive, with a long horizontal stroke extending to the right.