



Office of the Mayor

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May 18, 2021

To: Sustainable Madison Committee

Re: Response to Committee Letter on PFAS

Dear Committee Members,

Thank you for your letter outlining concerns and recommendations for City action on PFAS. Your letter is very thorough and considerate of the issues our residents are facing.

I share your concerns about PFAS and the City is actively working to address it on multiple fronts. While the City cannot address all of these issues alone, we do have a role to play, and I hope the information in this letter helps to clarify where the City's opportunities for action are, and where we can best support other agencies and organizations who are also working to address the issue.

Before responding to your specific recommendations, I want to ensure we are all starting with the same information. I want to first acknowledge that PFAS are ubiquitous chemicals that enter our environment from many sources. A significant but unquantified source of PFAS in Madison is from consumer products (such as carpet, non-stick cookware, waterproof clothing, and food packaging) that are purchased, used, and disposed of by residents, or that may have been manufactured locally. This is an international problem that requires national and international solutions, including action by consumers. The PFAS contamination of the Airport, National Guard Base, Starkweather Creek, and the lakes, however, largely stems from the historic use of PFAS-containing firefighting foams. Even if we are able to mitigate this contamination, we will not be able to mitigate the background contamination from consumer products.

Surface Water, Ground Water, and Drinking Water

We are dealing with PFAS contamination in three parts of our water system, and it is important to distinguish between them, as they present different risks and are subject to different proposed regulations. These include surface water, groundwater, and drinking water.

Surface waters, such as Starkweather Creek and our lakes, currently present the most pressing concern because of the potential health impacts from fish consumption. The State is undertaking a process to identify and adopt a regulatory threshold for surface water, which will likely be based on the relation

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between surface water PFAS levels and bioaccumulation in fish. Surface water will likely be subject to a different regulatory threshold than groundwater.

For ground water, Wisconsin has proposed a standard of 20 parts per trillion (ppt) of two PFAS compounds – PFOS and PFOA – combined. Levels exceeding that standard have been observed in shallow groundwater at the Dane County Regional Airport and Truax National Guard base. The PFAS levels found in this shallow groundwater are not representative of our drinking water, which comes from deep wells. While Madison’s shallow groundwater aquifer and deep groundwater aquifer are connected, water moves between them at different time scales, such that the deep aquifer is more protected from contamination.

Our drinking water comes from the deep groundwater aquifer. PFAS levels in our drinking water meet the State’s proposed 20 ppt standard. We regularly test and publicly share information about PFAS in our drinking water wells. In fact, we were early adopters in testing PFAS in our wells and continue to opt for more thorough testing than is being contemplated by regulations. Results of Madison Water Utility testing can be found [here](#). Water Utility staff are happy to explain further how drinking water is being tested and monitored for this and other contaminants.

I also want to note that Well 15 is one of the wells that serves the Truax area. That well also meets the proposed standard of 20 ppt for PFOA and PFOS, but was closed down in 2019 before the state standard was proposed out of an abundance of caution. The Water Utility is currently reviewing options to either treat the well water with carbon filtration to remove PFAS or replace that supply elsewhere in the City.

Public Information

Your letter mentions a concern that the public has not been kept informed and that a scheduled meeting was cancelled. I want to also acknowledge the numerous meetings and other communications that have occurred.

Regarding PFAS contamination in drinking water, the Madison Water Utility has held three community meetings related to Well 15 and Well 9 on the east side and also spoke at a neighborhood association meeting. They also have a dedicated PFAS website ([linked here](#)), and keep an email list of people who are interested in PFAS testing updates.

Regarding alerts of contamination, the City, the County, and Public Health of Madison Dane County held two community meetings, sent letters to homes near Starkweather Creek, posted newspaper alerts, released numerous media announcements to help turn local news attention to the issue, posted around 60 signs along Starkweather Creek and Lake Monona stating the public health fish consumption advisory, and engaged anglers in person to ensure they were aware of the pollution and recommended consumption limits. City staff have also provided multiple updates at City and Council committee meetings.

I believe the meeting that your letter mentioned was cancelled was one scheduled for 2020, and was altered because of COVID concerns. Instead of an in-person meeting, Dane County Regional Airport staff recorded and posted a video presentation on their website to update the community on remediation activities. That recording can be found on the Airport’s PFAS website [here](#). That is the only communitywide meeting that I or City staff are aware of that was not held as scheduled. Staff from

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Public Health and the Water Utility had also been invited as guest speakers to two neighborhood meetings that were cancelled due to COVID.

While sharing this additional information, I agree that we could improve communications and I go into more detail about how later in this letter. I just want to be clear that altering one meeting during COVID does not mean there haven't been multiple other community meetings and interactions.

Dane County Regional Airport, Truax National Guard Base, and Starkweather Creek Efforts

There are multiple efforts underway to investigate and mitigate the PFAS pollution found at the Truax National Guard Base and the Dane County Regional Airport. PFAS at these sites comes from firefighting foams discharged either for fire suppression, equipment checks, or training exercises, and is assumed to be the major source of PFAS entering Starkweather Creek, which then enters Lake Monona and gets into fish tissue. The hope is that remediating these sites and/or otherwise keeping the pollution from entering Starkweather Creek will quickly result in reduced PFAS in fish tissue.

The City is a partner in the work occurring at the Dane County Regional Airport, with Dane County playing a lead role. The City is involved in work related to two on-site fire training areas (also called "burn pits") because we are a former owner of the airport (until 1974) and we are likely a former user of the fire training areas. The City meets regularly with representatives of the Airport, DNR, and Air National Guard regarding investigation, mitigation, and remediation at the airport.

The City does not have a role in the clean-up of the Truax 115th Fighter Wing National Guard site. This work is being led by the National Guard. More information can be found on their [website](#). Their remedial investigation is anticipated to begin in 2021. My understanding is that the investigation is currently planned to extend beyond the Truax property, and will also include the two burn pits because the Guard was also a former user of those sites.

It is good news that the main known sources of pollution – the Truax site and the burn pits – are being included in the National Guard's remedial investigation. The remedial investigation is one stage of the Federal CERCLA clean-up process, and we are hopeful that federal funding will continue through the following stages for full remediation. We have been in communication with our federal delegation advocating for that.

However, this work takes time, and the DNR has rightfully requested additional steps be taken in the interim to stop the pollution from leaving the site and entering Starkweather Creek. To that end, we recently coordinated with the County Airport and Air National Guard staff on a plan to do that. The DNR-approved plan focuses on managing Airport stormwater pipes to keep the polluted shallow groundwater from entering the pipes, which would then direct the water toward the creek. We are hopeful that severing that connection to the pipes, and ultimately to the creek, will keep the contaminated shallow groundwater onsite and lower pollution levels in the creek until such time as the source of pollution is addressed. The creek will be tested for PFAS before and after the stormwater work to determine the effectiveness of the efforts. The full plan can be found [here](#).

Other Issues

Your letter mentioned two concerns related to other non-City agencies that I wanted to briefly address. You mentioned a community concern about proposed construction on the Truax National Guard base

related to F-35s, and a worry that this would disturb pollution on the site. The Wisconsin Department of Natural Resources is working closely with the Guard to ensure proper treatment of any soil or water disturbed, and you can find their soil and groundwater management plans and WI DNR approvals [here](#). I am unable to speak to the details of these plans as the City does not have oversight of this federal- and state-led project, but we have forwarded a copy of your letter to both parties.

You mentioned a growing concern about PFAS potentially being spread on agricultural land through bio-solids. This is a question outside the City of Madison’s jurisdiction as Madison Metropolitan Sewerage District is a separate public entity and the majority of agricultural land is outside of the City limits. You can find details regarding the Sewerage District’s plan to test and manage PFAS contamination [here](#). I have forwarded your letter to the Sewerage District, and the Commissioners that I appointed to their Commission.

Finally, I want to ensure you are aware that the Madison Fire Department stopped using PFAS-containing foams and safely disposed of our PFAS-containing foams in 2019. We take the health issues related to PFAS seriously, and were early adopters in converting to alternative, PFAS-free foams and have been leaders in the effort to educate other fire departments in the state about the need for, and the efficacy of, alternatives.

Additionally, we have advocated to the state to adopt clear, science-based standards, and we’ve advocated to our federal legislators for resources to address known PFAS contamination including at Truax Field. Senator Tammy Baldwin is working to advance this issue.

Response to SMC Recommendations

I support inter-agency coordination, clean-up of PFAS contamination, clear and regular communications, health assessments of PFAS exposure, and food support to those who are food insecure. With multiple agencies taking point on multiple aspects of this work, I believe there are places where the City of Madison should lead and places where the City is more logically a participant. To help illustrate this, I’ve included a table to outline various activities happening related to PFAS, and who is leading each effort.

Activity / Topic	Lead Agency(ies)
Truax National Guard Base – remedial investigation of PFAS contamination	National Guard Bureau in coordination with the WI Air National Guard
Dane County Regional Airport PFAS investigation and mitigation	Dane County & Dane County Regional Airport , in coordination with City of Madison and WI Air National Guard; Overseen by WI Dept. of Natural Resources
Health impact assessments of PFAS exposure	WI Dept. of Health Services
PFAS standards development and rulemaking	WI Dept. of Health Services and WI Dept. of Natural Resources
F-35 construction management standards related to PFAS	WI Dept. of Natural Resources and WI Air National Guard
PFAS in wastewater discharge or biosolids	Madison Metropolitan Sewerage District (non-City agency)
Fish tissue sampling and lake water sampling for	WI Dept. of Natural Resources

PFAS	
Public fish consumption advisories and communications	Public Health Madison Dane County (joint City-County agency) in coordination with WI Dept. of Natural Resources
Yahara Lakes Coordination and Management	Dane County, and Dane County Lakes & Watershed Commission
Drinking Water in Madison	Madison Water Utility (City agency)
Public Information	All
Eliminating PFAS from fire-fighting foams	All agencies with Fire departments (Madison has removed PFAS-containing foams already)
Advocating for State PFAS standards	All

This information influences my response to your three specific requests as follows.

PFAS Task Force: The City Council considered a PFAS Task Force in 2019 and opted not to adopt a proposal at that time. While I cannot speak for what ultimately determined the Council’s decision, I know that several questions were raised at that time that I believe are still important to answer before moving forward. These include: (a) should the City lead and manage a task force when most PFAS-related activities are managed by other units of government, or should another unit of government lead the effort? and; (b) how will the formation of a Task Force enhance the coordination and activity already occurring? If a Task Force were formed, I would support the City’s participation, but I do not currently see a strong case for the City to lead it. It might be more effective if led by a regional or state agency.

Communications: I agree with you that this is an area where the City can do more, and I will commit to doing so. I am committed to the following:

- Multiple community meetings each year to provide a forum for people to ask questions, hear updates, and provide feedback. City staff are able to hold meetings for the general community to attend, and are also able to attend the meetings of other groups as guest speakers.
- A regular email status report of PFAS-related activities to interested community members. Public Health Madison Dane County has committed to leading this effort.
- Regular updates to City Council and to other interested City committees
- Fresh efforts to ensure angler awareness of contamination in fish, and to link those facing food insecurity with other opportunities for free food, such as through Madison’s 19 food banks.

This is in addition to existing Water Utility email lists and websites, and the websites and communications of other agencies. As always, staff from the Mayor’s Office, the Water Utility, Stormwater Management, and Public Health are also available to answer questions or participate in neighborhood meetings on this topic. If you have additional ideas for regular engagement and communication on this topic, please let me know.

Health assessments and resources for those facing food insecurity: I agree on the importance of health impact assessments and I want to point out that this work has been occurring, led by the State Department of Health Services. It is their work that has led to recommended standards for drinking water, recommended standards for surface water due to its linkage to fish contamination, fish advisory

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warnings, and information that there is no risk of exposure through contact with the water (recommendations related to contact were based on a risk that pets and small children may ingest the water). I believe the City can play a more meaningful role by supporting these standards and working with other agencies to help meet these standards than by repeating the health impact assessments that have occurred.

I also think the City can work with Public Health to increase our support to anglers facing food insecurity. Resources do exist to support those who are food insecure, such as through [Madison's 19 food banks](#). Upon hearing your suggestion for this work, I've spoken to Public Health, and we will work together to re-engage with anglers and with communities that rely heavily on local fish in their diets. We can ensure they are aware of fish consumption advisories and of other free healthy food resources. We will also plan to engage with communities that may eat more local fish in their diets to learn more about how we can better support their dietary, cultural, and/or other values that relate to fishing. I am committed to working with Public Health and the County, which is directing millions in federal funds to food banks, to pursue this idea, and will ask staff to report back to this committee and others regarding progress and outcomes. However, I ask you to please keep in mind that this may be impactful to only a subset of anglers, as people have many different motivations for fishing.

Ultimately, I believe we share the same goals of working across agencies and organizations to clean up contamination for our residents and our environment. I hope it is clear from this response that the City of Madison takes PFAS pollution seriously, and that we are working on multiple fronts to address it with other units of government who share authority over various aspects of the issue. I hope this information about our multiple drinking water efforts, fire foam replacement efforts, our coordination with Dane County and the Air National Guard on clean-up efforts, our advocacy for standards and resources, along with a new commitment here to increase our community engagement efforts to seek input, share information, and offer alternatives for anglers facing food insecurity help to collectively demonstrate my commitment to this issue. I hope I also have made clear that the City cannot tackle these issues alone, and that we are actively working with other units of government engaged in these efforts. We will continue doing so, and we will share any information or progress from that work as part of our communication efforts.

I encourage you to invite City staff to share more detail about the efforts discussed in this letter at your meetings. Staff would be happy to invite other governmental agencies to provide updates as well if that is desired.

Thank you for the time you put into raising this issue, and please feel free to reach out with questions at any time.

Sincerely,



Satya Rhodes-Conway
Mayor

CC: Common Council