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To: President's Workgroup on Environmental Justice <EnvJusticeWG@cityofmadison.com>

Subject: 1/29/2021 Agenda item 3: PFAS

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3. PFAS: Broad Discussion

a. Overview of Issue(s)

Status of Interim Actions at Truax

- The BAM stormwater treatment has been ineffective, probably due to lack of a retention pond and insufficient contact time between the stormwater and granular activated carbon filter.
- The Air Force is rewarding this failure by soliciting a proposal from the same Verona company to inject bacteria into the ground. There is little indication that this will accomplish anything other than to increase the levels of PFOA and related compounds. However, both of these actions help to convey the idea that they are doing something without having to spend the kind of funds that could buy effective treatment.
- Inspection/repair of storm sewers to prevent contaminated groundwater from leaking into them has been delayed until next year.

I am told by local Air Guard officials that consultants have been contracted for the site investigation and for the drinking water study. I was told by Steve Ales (DNR project manager) last February that a site investigation work plan was expected in August 2021. As of 11/29/2021 nothing has been filed on the BRRTS (DNR brownfields database) pages listed on the county PFAS web page.

b. City vs County Role(s) for Clean-up & Public Health

The secret discussions between the county, air force and city as well as the decision to reserve all public comment to the corporate counsel leaves the impression that the county views itself solely as party legally responsible for the contamination, rather than an advocate for the citizens whose health is endangered. Since the city owns the affected municipal wells and includes the known contaminated private well, one wonders whether any public entity represents the citizens.

If so, the city should pressure the National Guard Bureau to test more private wells than the single one they've done so far, which came in at double the DHS proposed level.

c. Setting a Drinking Water Standard

The ongoing EPA toxicology review suggests that a protective level would need to be below 1 part per trillion as opposed to the 20 ppt proposed by DHS.

Of particular concern is the negative impact on the immune system. The City cannot rely on the DHS-proposed value to be sufficient.

d. Update on Well 15 & Water Quality in Madison

The water utility did a bench scale study to test the feasibility of a water treatment system. In Oakfield MN, such a system was installed for the most heavily contaminated well. This not only made the water drinkable, but it has the long-term advantage of removing PFAS from the aquifer as opposed to allowing it to continue to spread. This should be an important consideration when evaluating treatment for well 15.

I will be listening in to the meeting. If chat is enabled I might be able address some questions.

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