

—TOWN OF—
MIDDLETON
Wisconsin

January 4, 2023

Jhalversonmdphmdc@gmail.com

phbohsupport@cityofmadison.com

Dr. Jerry Halverson, Chair
Board of Public Health Madison & Dane County

Dear Chair Halverson,

We have received and reviewed the 12/5/22 Public Health Staff Report titled, *Assessing Childhood Lead Poisoning Risk from Middleton Municipal Airport* (“Report”), on airborne lead exposure in the vicinity of the City of Middleton’s Municipal Airport-Morey Field (a/k/a “Morey Airport” or “C29”). We find this Report’s analysis incomplete and totally lacking any conclusions or recommendations. The Report does not significantly acknowledge the previously provided Trinity Consultants March 18, 2022 Modeling Report (“Modeling Report”) with an area map showing the location of airborne lead particles in areas around Morey Airport. Furthermore, it also does not acknowledge the specific Trinity airborne lead field testing and the September 15, 2022 Report, which validate the Modeling Report with respect to the actual location of breathable airborne lead particles from Morey Airport operations in a number of places specified on the modeling maps.

Dane County has the second highest amount of lead aircraft emissions of the seventy-two counties in Wisconsin, and Morey Airport produces 32% of Dane County’s airborne lead. The Public Health Board’s failure to fully acknowledge the Trinity Consultants Modeling Report with respect to the distribution and exposure of this airborne lead in the vicinity of Morey Airport is more than perplexing. This is especially true when your Report states on page 6, “Modeling studies cited previously in the 2022 Proposed Rule Summary by the U.S. EPA are more suited to answer the big picture question of risk that can be applied to the Middleton context.” This modeling study, which your Report states is needed to fully analyze the lead risk around Morey Airport, is the exact type of modeling study that has been furnished to you as completed by Trinity Consultants.

The Public Health Report does seem to acknowledge that there is no safe level of lead exposure in humans, especially children. However, it then cites an outdated 2008 US EPA Lead National Ambient Air Quality Standard for intervention as an indication that the exposure near Morey Airport is not high enough to be a current problem.

You must be aware that the U.S. EPA Integrated Risk Information System has found it inappropriate to specify an acceptable minimum safe level for airborne lead exposure because no

threshold for lead toxicity has been established. The damage, especially in children, may occur at blood lead levels so low as to be essentially without a threshold. The CDC has noted there is no safe level of lead exposure, and the body absorbs higher levels of lead when it is inhaled.

Since we forwarded the Trinity Consultants Modeling and Air Testing Reports (which are also available on the Town website: <https://town.middleton.wi.us/>) with our communications to Public Health dated May 3, 2022, and September 21, 2022 (as a cc in a letter to the City of Middleton), we have obtained water testing data from the USGS, which tested groundwater, surface water and some private well water, all in the vicinity of Morey Airport.

Six private wells that provide drinking water for private residents in the general vicinity of Morey Airport were tested. Two of those private wells were found to contain lead, the source of which was traced by isotope identity directly to Morey Airport avgas. This further validates the Trinity Modeling Report with respect to where the airborne lead from Morey Airport operations is being deposited. Some of our Town residents are not only forced to breathe the lead pollutants from Morey Airport, but they may also be drinking those particles.

You should also be aware that the several schools in the Town of Middleton are directly under the low altitude flight paths of Morey Airport aircraft as they arrive at or leave Morey Airport, and all of these schools rely on private wells for drinking water.


In addition, the U.S. Geological Survey (USGS) testing of surface water in the Morey Airport vicinity found the presence of toluene, a possible carcinogenic. Toluene is an element in Jet A fuel and is used as a solvent in paint thinners and cleaning agents. The U.S. Environmental Protection Agency (U.S. EPA) has stated that Morey Airport operations produce over 309 pounds of airborne toluene annually and it is now in surface water in the vicinity of the airport (U.S. EPA, 2017; USGS 2022). The central nervous system is the primary target organ for toluene toxicity, and infants and children may be more susceptible to the effects of toluene because their nervous systems are still developing.

If public health does not believe there is airborne lead exposure in the many areas around Morey Airport noted in the Trinity Modeling Report and that whatever is there is not of any danger to the children who live, go to school and use the playgrounds and parks near Morey Airport, then you have an obligation to advise all of us of that belief and upon what scientific studies or reports you base it. If, in the alternative, you do find Morey Airport operations are generating airborne lead exposure to people living, going to school or using the playgrounds and parks around Morey Airport, then your stated public purpose and obligation requires you to advise people of the risk created by this lead exposure and provide recommendations on how to prevent that exposure, which is cumulative.

We look forward to receiving a meaningful reply.

Sincerely,

Town Board, Town of Middleton, Wisconsin

By: 
Cynthia Richson, Town Board, Chair

Approved by the Town Board of the Town of Middleton authorizing the Town Chair to sign on behalf of the Town Board on January 3, 2023, by a vote of 4-0 (Supervisor Opin, excused absence).

Cc: Governor Tony Evers; EversInfor@wisconsin.gov

Maggie Gau, Chief of Staff, Office of the Governor; Maggie.gau@wisconsin.gov

Brian Weaver, WI DHS, Governor Evers Lead Policy Advisor;
brian.weaver@dhs.wisconsin.gov

Marjorie J. Coons, Childhood Lead Poisoning Prevention Program Manager, WI Division of Public Health; Margorie.Coons@dhs.wisconsin.gov

Joe Parisi, Dane County Executive; parisi@countyofdane.com

Josh Wescott, Chief of Staff, Office of the Dane County Executive;
wescott@countyofdane.com

Robert Hesselbein, School Board President, Middleton-Cross Plains Area School District; roberth@mcpasd.k12.wi.us

U.S. Representative Mark Pocan; mark.pocan@mail.house.gov

State Senator Dianne Hesselbein; Sen.Hesselbein@legis.wisconsin.gov

State Representative Mike Bare; Rep.Bare@legis.wisconsin.gov

Jim Pulvermacher, Town Board Chair, Town of Springfield;
chairperson@town.springfield.wi.us