



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besadny, Secretary
Southern District Headquarters
3911 Fish Hatchery Road
Fitchburg, WI 53711
TELEFAX NO. 608-275-3338

November 29, 1990

Mr. Ronald Sachse, Base Civil Engineer
Wisconsin Air National Guard
3110 Mitchell Street
Madison, Wisconsin 53704-2591



File Ref: 4430
DCN: Truax 2 15522
Title: Comments on SI Report
ARF 29 Nov 1990

Subject: Site Investigation Wisconsin Air National Guard Truax Field Madison,
Wisconsin

Dear Mr. Sachse:

The Department of Natural Resources has reviewed the report entitled, "Site Investigation Wisconsin Air National Guard Truax Field Madison, Wisconsin", prepared by Kapur & Associates, Inc. and Warzyn Engineering, dated September 26, 1990. The information presented in this report detail the testing of selected underground storage tanks and provides a first phase soil and groundwater investigation. The report identifies a number of potential sources of contamination in addition to the tanks that were tested. The Department agrees with the conclusion and recommendation section of the report that a more indepth investigation needs to be done at the facility. In addition, the suggested remedial measures including taking suspect tanks out of service and soil remedial actions are necessary. The recommendation for additional groundwater investigation is needed to determine the method of groundwater remediation that is appropriate for this site.

The following items need to be addressed prior to the Department reviewing a proposal for a second phase investigation.

1. Determine if private wells referred to in the report are in use and if so they should be included in any sampling plan submitted for the groundwater investigation.
2. MW-8 exhibited two non-aqueous phase liquids, both phases should be characterized.
3. Is the oil water separator discharge approved to go into the sanitary sewer? If so, a copy of that approval should be provided to the Department.
4. Tank line tests and interpretations not included in this report, should be provided to the Department.
5. The information on tanks labeled used oil/solvent should be more detailed. At a minimum the following information needs to be provided.
 - a. Type of solvents that were put into the tanks.

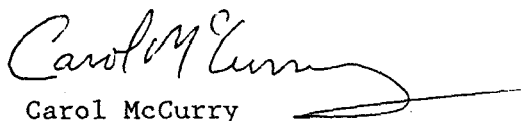
- b. Records that would provide information as to the amount and disposal of waste solvents from 1981 to the present.
 - c. The dates of the use of each of the used oil/solvent underground tanks for material that would be classified as hazardous waste.
 - d. Information concerning the possible mixing of waste oil and waste solvent in the underground tanks labeled 'used oil/solvents'.
6. Contamination from surface spills (other than the two reported spills) were referenced in the report. Any additional information on over fills or other surface discharges should be provided to the Department.

The proposed wells should include nested wells for the determination of vertical gradients. The use of in-situ hydraulic conductivity tests and very detailed boring logs will be helpful in determining the full vertical and horizontal impact of groundwater contamination from the facility.

In addition to the underground tanks and the spills referred to in the above mentioned report, other areas of concern exist. These areas are identified in a March, 1989 entitled, "Engineering Report Contamination Evaluation Truax Field Madison, Wisconsin", prepared for the U.S. Army Corps of Engineers, by Envirodyne Engineers, Inc. In particular, the areas identified as the 'burn area' and the 'JP4 tank area' are of concern to the Department. The Department is unclear about the relationship of these areas to WANG activities. What agency has responsibility for completing the investigation at those sites?

If you have any questions concerning this matter please call me at (608) 275-3310.

Sincerely,


Carol McCurry
District Hydrogeologist

cc: Mr. Don Williams - NGB/DEVR
Mr. Patrick McCutcheon - SD
SW/3 - LUST