

Minutes of Meeting With  
WIDNR, WIANG, ANG/CEV  
16 Oct 1995

18 Oct 95

1. A meeting was held at Truax ANG base on 16 Oct 95 to discuss issues surrounding Installation and Restoration Program (IRP) Site 4 - UST 405-3 & 4 at Truax ANG base. This site includes the POL facility and some surrounding areas.
2. Present at the meeting were the following (see attached list for phone numbers):

**WIDNR**

Steve Sisbach (Enforcement Specialist Southern District)  
Mike Schmoller (Hydrologist, Southern District)

**WIANG**

BrigGen F. Sloan (Wing Commander)  
Col Dave Thompson (Base Commander)  
Lt Col Cheryl Prisland (Deputy for Support)  
Maj Keith Gertz (Base Civil Engineer)  
Maj Terry McArdle (WI National Guard Judge Advocate)  
Capt Mark Lampe (Base Environmental Manager)

**ANG/CEV**

Gary Hinkle (Chief Installation Restoration Branch)  
Roseann Sendek (NGB Judge Advocate)  
Ruth Lodder (IRP Project Manager)  
Rick Weston (RCRA Program Manager)

3. The meeting began with introductory remarks by BrigGen Sloan. Gary Hinkle then provided a brief explanation of expectations of the meeting. Ruth Lodder presented the IRP history at the base, the relative risk site evaluation process, and the relationship between relative risk and project scheduling for IRP Site 4. The meeting was then opened for discussion. During the open discussion the Wisconsin Department of Natural Resources (WIDNR) expectations and position were explained and discussed. Items of discussion and positions are listed below.

4. WIDNR's Position: It was WIDNR's position that the contamination at IRP Site 4 was too high for natural attenuation to be an acceptable method of remediation. The constituent with the highest concentration is benzene (26,000 ppb in groundwater sampled from one location). WIDNR believes that only some sort of active remediation would be acceptable. It was pointed out that several sites had been under study since 1988 and WIDNR felt that WIANG was not being responsive and as such could be subject to a "Unilateral Order" to comply.

ANG/CEV pointed out that Site 4 is a medium risk site as scored by the IRP program using the relative risk site evaluation process and invited WIDNR to provide input if they were aware of any issue that could raise the relative risk of the site. A copy of the Relative Risk Site Evaluation Primer (Summer 1994) and the October 1995 Relative Risk Site Evaluation Worksheets for IRP Sites 4, 5, 6, 7, & 8 were provided to WIDNR. It was also mentioned that IRP site 4 is a CERCLA site and WIANG and ANG/CEV were constrained by law and DoD policy on funding of remediation for the site.

5. Unilateral Order: There was much discussion on this subject. WIDNR felt that Truax was in their jurisdiction and subject to a "Unilateral Order". It was explained that because the base was under a federal lease Sovereign Immunity would apply. It was also explained that if a "Unilateral Order" was issued ANG/CEV would not be able to implement any remediation at the site until the order had been adjudicated which could take up to five years. It was also explained that the US Government had not waived Sovereign Immunity under the CERCLA program and that the site would be remediated to CERCLA standards.

6. Air Force Center for Environmental Excellence Report on Natural Attenuation at IRP site 4: There was much discussion and agreement that this report requires a substantial revisions. As a scientific study of natural attenuation versus a study to conform to a regulatory standard, ANG/CEV stated that the report should never have gone to WIDNR. ANG/CEV stated there are major deficiencies in the report that make it difficult to interpret and confusing. ANG/CEV also noted that as written the report did not meet WIDNR standards since it fails to evaluate at least 3 different methods of remediation. The report is does not provide a clear and easy to understand representation of the analytical methods and test results and does not provide a logical presentation of conclusions.

7. DoD & State Memorandum of Agreement (DSMOA) and CERCLA: ANG/CEV explained that through the DSMOA (which Wisconsin has signed with DoD), the state agreed to accept DoD prioritization of CERCLA/IRP sites as a condition to receiving moneys for oversight and document review of CERCLA/IRP sites. The WIDNR representatives were unaware of this and indicated they would check with the applicable state office on the details.

8. Natural Attenuation as a viable method for IRP site 4: ANG/CEV stated that by considerable additional effort and reviewing previous studies of IRP Site 4 and comparing those with the data from the study mentioned in the AFCEE report, it did appear that natural attenuation was taking place. A copy of the data analysis was provided to WIDNR in tabular form. It was agreed by WIDNR and ANG/CEV that the presentation of the AFCEE report would need to include this type of data to show clearly that natural attenuation was occurring. WIDNR then stated that natural attenuation was not acceptable for groundwater remediation. A discussion ensued surrounding WIDNR code ILHR 47.355 [3]{a} which requires that natural

attenuation be considered as a method of remediation and that if it is not used a rationale must be provided. WIDNR indicated that they believed that did not apply to groundwater. ANG/CEV indicated that during a discussion with Michael Barden (WIDNR - Emergency and Remedial Response Section) about the AFCEE report and IRP site 4, he indicated that natural attenuation was an acceptable form of remediation for groundwater in general but didn't know if it could apply in this case (in part due to the lack of organization in the AFCEE report).

9. Timelines: As a medium risk IRP site, current DERA guidance requires a remediation to be installed by the end of FY 2008. Because ANG is ahead of other DoD agencies in remediation of high risk sites, remediation at medium risk IRP sites may begin as early as FY 2000 based on current projected budgets. IRP Site 4 at Truax is currently programmed for a Remedial Investigation/Feasibility Study (RI/FS) in FY99. These dates are subject to change based on the availability of funding in the Federal budget.

An alternative plan, that ANG/CEV has been pursuing for over a year (prior to any request by WIDNR), is to remediate the site using a military construction program project (MILCON) as part of the construction of a replacement POL facility. Currently the new POL facility is scheduled as part of the Fiscal Year 1999 MILCON program. A MILCON to remove the current POL facility once the new one is operational is scheduled as part of the Fiscal Year 2000 MILCON program.

WIDNR was unwilling to accept this time table and requested active remediation to begin in the near future. ANG/CEV again explained the relationship between the DSMOA and state agreement with DoD prioritization of CERCLA/IRP sites. ANG indicated that by trying to put IRP Site 4 remediation as a MILCON, ANG/CEV was attempting to remediate the site earlier than it would be remediated under current DoD guidance.

It was noted by ANG/CEV that a large portion of the soil in IRP site 4 was remediated using Low Temperature Thermal Treatment (LTTT) in 1993.

ANG/CEV and WIANC noted that the only high relative risk site at Truax Field (IRP Site 8) was already being remediated using a Soil Vapor Extraction (SVE) system, and that the Federal government has already spent several million dollars on remediation projects through the IRP as well as various MILCONs whenever contamination was discovered that was a threat to the environment or human health and safety.

ANG/CEV explained that they are prevented by Federal regulation from altering the time schedule of the DoD IRP program with regard to IRP Site 4. ANG/CEV offered to hold a training seminar on the relative risk site evaluation for WIDNR and to let WIDNR rescore or to assist them in rescoring the site. It was

indicated that if the site score changed, ANG/CEV would change the remediation schedule for IRP site 4 accordingly.

10. Action items:

WIDNR

1. Gave an immediate 30 day extension to 17 November 95 for the schedule for remediation of IRP Site 4 as requested in the original letter to ANG/CEV.
2. Was to determine the impact of the DSMOA from the appropriate State agency.
3. Was to determine the affect a "Unilateral Order" would have on the remediation of IRP Site 4.
4. Was to review the Relative Risk Site Evaluation Primer and Relative Risk Site Evaluation Worksheets for IRP Sites 4, 5, 6, 7, & 8.

ANG/CEV

1. Have AFCEE revise the draft Remedial Options Alternatives Evaluation of IRP Site 4 with substantial changes required to meet the minimum WIDNR and ANG requirements.
2. Provide a proposed schedule for remediation of IRP Site 4 by 17 November 95.