

George E. Meyer
Secretary

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Southern District Headquarters
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September 12, 1995

DCN: Truax 3 43142
Title: Disapproval of Remediation
Choice

ARF 12 Sep 1995

Air National Guard Readiness Center/CEV
ATTN: Ruth Lodder
3500 Fletchet Avenue
Andrews Air Force Base
Maryland, 20331-5157

SUBJECT: Wisconsin Air National Guard at Truax Field, Madison, WI

DRAFT Remedial Action Plan Dated February, 1995 and received by the Department July, 1995 Supporting Intrinsic Remediation (Natural Attenuation) for the Jet Fuel Transfer Line Southwest of Building 412 and the POL Yard.

Dear Ms. Lodder:

The Department has reviewed the above referenced document which recommends natural attenuation for the remediation of petroleum contamination at Truax field. We have significant concerns with this recommendation and on August 24, 1995, a meeting was held with with Captain Mark J.T. Lampe, P.E. to explain our concerns, to inform Captain Lampe that natural attenuation is not an acceptable form of remediation and to request a schedule for the implementation and completion of active soil and groundwater remedial measures.

Captain Lampe informed the Department that no funding is presently available to implement active remediation but that he would continue efforts to obtain funding for this project. He also suggested that we relay our concerns to you.

Section 144.76, Stats. requires a person who possesses or controls a hazardous substance which was discharged, or who caused the discharge of a hazardous substance, to take the actions necessary to restore the environment to the extent practicable and to minimize the harmful effects from the discharge to the air, lands or waters of the state.

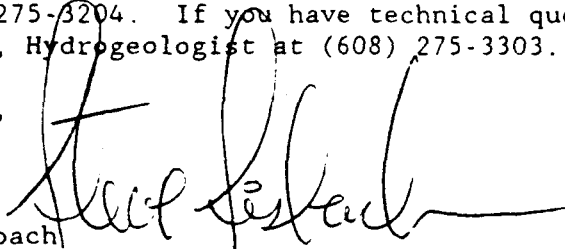
Chapters NR 720 and NR 140, Wis. Adm. Code establish standards for the protection of soil and groundwater quality. The results obtained from soil and groundwater monitoring document the presence of petroleum contaminants at levels significantly above the standards established by Wisconsin law. For example, the level of benzene in the groundwater at monitoring well CPT17S is 26,000 micrograms per liter while the Ch. NR 140 standard for benzene is 5 micrograms per liter. Active remediation of the soil and groundwater will be necessary to achieve state pollution control standards.

It is essential for the Wisconsin Air National Guard to implement and complete active remediation according to a reasonable schedule. On November 2, 1994, the Department mailed a letter (copy enclosed) to the Wisconsin Air National Guard requesting a remedial action proposal and schedule for action. No response or communication was received until the July, 1995 receipt of the DRAFT natural attenuation report. We are again requesting that a schedule for designing, implementing and completing active remedial activities be provided.

We are asking you to provide this information by October 18, 1995. It is our preference to resolve this issue without the need for escalated enforcement action but you should be advised that the Department has the authority to issue Unilateral Orders to establish a binding schedule for the completion of remediation activities. You should also be advised that violations of Unilateral Orders may be prosecuted by the Wisconsin Department of Justice.

If you have questions about this letter, please contact me at (608) 266-7317 or (608) 275-3204. If you have technical questions, please contact Mike Schmoller, Hydrogeologist at (608) 275-3303.

Sincerely,



Steve Sisbach
District Enforcement Specialist

cc: Captain Mark J.T. Lampe, P.E., Wisconsin Air National Guard,
3110 Mitchell Street, Madison, WI 53704-2591

Major Keith Guerts, Wisconsin Air National Guard,
3310 Mitchell Street, Madison, WI 53704-2591

Mike Schmoller - SD