

CORRESPONDENCE/MEMORANDUM

Date: July 25, 1989
 To: Joe Brusca
 From: Laurie Egge
 Subject: Truax Air National Guard Fire Training Site

File Ref: 4440
 Spills - Dane County

Owned by Air Nat. Guard: NLR should be requiring them to upgrade or pull the USTS.

In December of 1988 the Department received a report titled "Preliminary Assessment, 128th Tactical Fighter Wing, Wisconsin Air National Guard, Truax Field." This report was prepared by PEER Consultants, and covered property currently owned by the Air National Guard. The PEER report recommended no further action on two old fuel spills. I drafted a response stating that the fuel spills needed further investigation, which could be done at the same time as the 33 on site USTs (age from 4 to 38 years) were being evaluated. I also asked for additional information regarding the aircraft washing area and the off site fire training area. *Response has never been sent.*

Prior to finalizing my letter I contacted Dave Benzschawel, City of Madison Engineering. He advised that the Department of Defense had contracted with Envirodyne Engineers for another report to study environmental impacts at properties currently and formerly owned by the National Guard (DOD had supplied the Envirodyne Report to the City, but not to the Department). I obtained this report from the Army Corps.

The fire training area was used by the military, the City of Madison, Dane County, and other local fire departments up to 1987. It is located about one half mile north of the Truax landfill.

Waste fuels and solvents were burned on the ground for fire training purposes. Over 2500 gallons of waste flammable per year was disposed of this way by the military alone. The burn area is still clearly visible. Monitoring wells installed for the Envirodyne Report show heavy metal contamination (cadmium, chromium, lead) in excess of enforcement standards and VOCs (benzene, toluene, tetrachloroethylene, trichloroethylene, vinyl chloride). The report also indicates that contamination exists at the abandoned jet fuel storage area, and at the old Town of Burke wastewater treatment plant. Surface water contamination has also been documented.

In May I contacted Steve Yekish with the Army Corps, who said the military is unlikely to give the Truax site a high ranking or additional funding in the foreseeable future. The site has been ranked as high priority by the Southern District groundwater committee.

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Possible options to address the site include:

1. RCRA violation enforcement. No approval was given by Southern District staff for use of waste fuels and solvents in fire training. No sample data is available, although the flammability of jet fuel seems obvious.
2. Superfund program follow up: The Department of Defense gave the site an HRS of 35.59.
3. Spills follow-up: This may be the clearest authority. Any Departmental requirements, however, are likely to become snarled in negotiations among the various responsible parties, as well as the usual entanglements of dealing with units of government.

To date no formal response has been made to either the PEER report or the Envirodyne Report.

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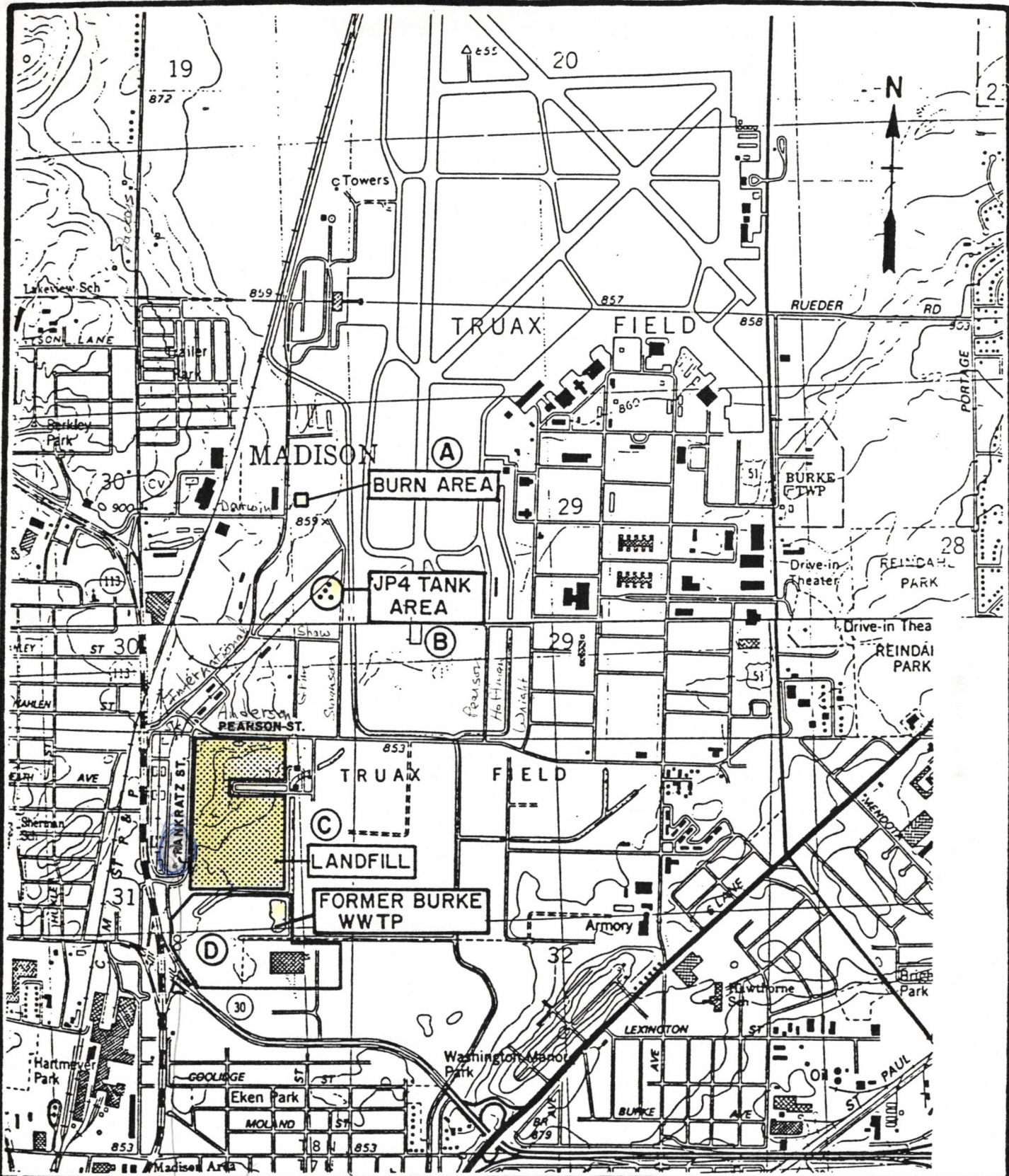


FIGURE 3-1

Potential Sources of Contamination Truax Field

Madison, Wisconsin

ENVIRODYNE Report



*sites A, B, + C now owned by Dane Co.
 D is private
 B - Spill*

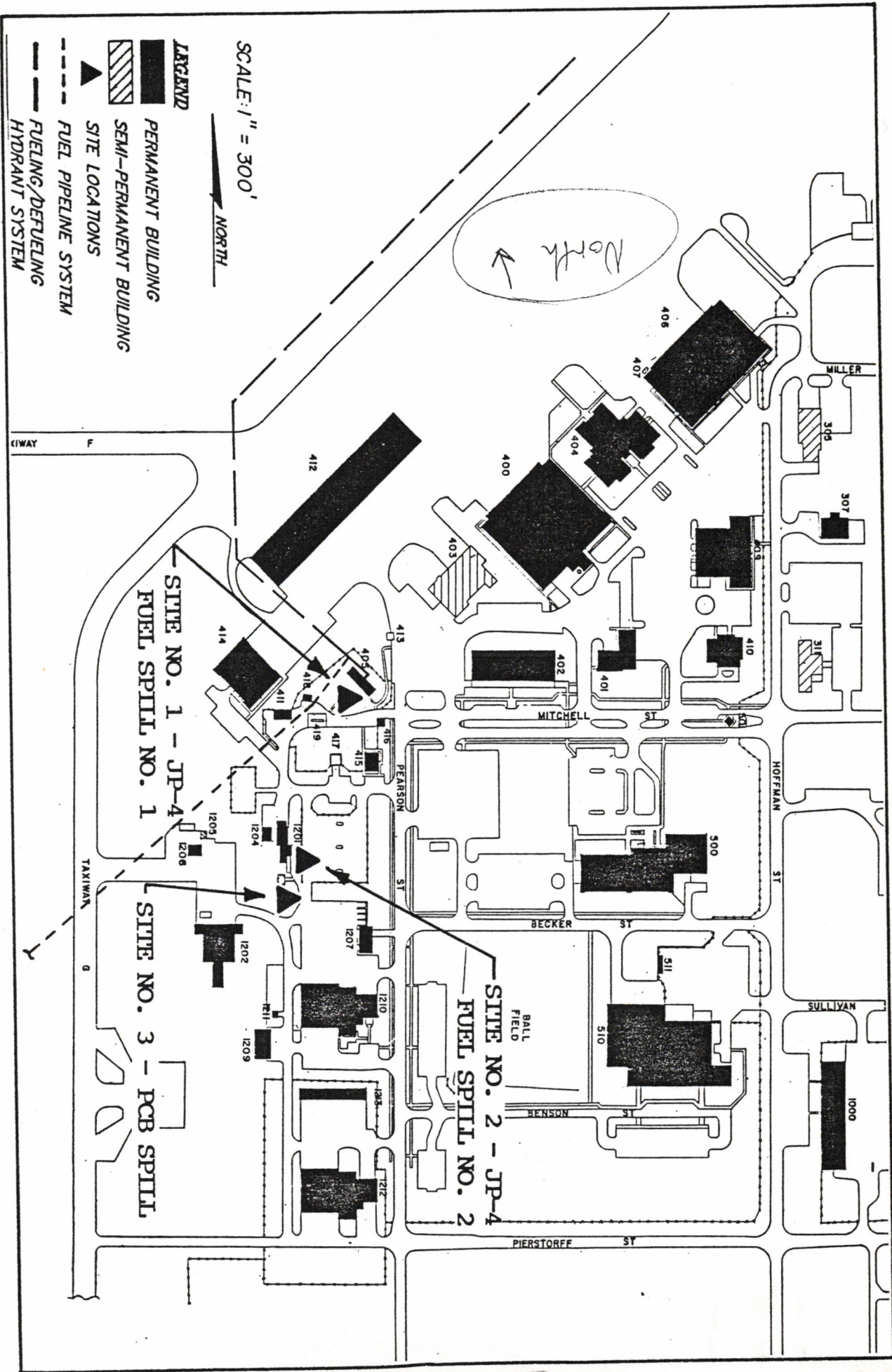


Figure IVA. LOCATION OF SITES 1, 2, AND 3. 128th TFW, WISCONSIN AIR NATIONAL GUARD, TRIAX FIELD, MADISON, WISCONSIN