

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor  
George E. Meyer, Secretary  
Gloria L. McCutcheon, District Director

Southeast District Annex  
4041 N. Richards Street, Box 12436  
Milwaukee, WI 53212-0436  
TELEPHONE 414-229-0800  
FAX 414-229-0810

December 18, 1996

FID 241280270  
UID 0341001178

Robert Knighten  
Milwaukee County Department of Public Works  
Courthouse Annex Room #314  
907 North 10th Street  
Milwaukee, WI 53233

Dear Mr. Knighten,

RE: Milwaukee County Airport  
Baggage Claim  
5300 S. Howell Ave., Milwaukee, WI

Based on the underground storage tank removal documentation provided to the Department, it appears that the referenced site meets the petroleum cleanup objectives outlined in chs. NR 700 to 724, Wis. Adm. Code. Therefore, the Department considers the case "closed," having determined that no further action is necessary at the site.

The case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare or the environment.

Thank you for your cooperation in the investigation of petroleum contaminant levels during the tank removal.

Sincerely,

  
Charles J. Krohn  
Hydrogeologist

November 12, 1996  
(302553295/7001)

Mr. Charles J. Krohn  
WDNR SE District  
4041 N. Richards Street  
P.O. Box 12436  
Milwaukee, WI 53212

RE: **REQUEST FOR CLOSURE** : Milwaukee County Airport - Baggage Claim, 5300 S.  
Howell Avenue, Milwaukee FID 241280270

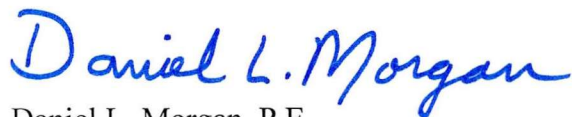
Dear Chip:

Milwaukee County has requested that Hydro-Search research this site and determine if further action is necessary to gain closure. Information furnished by the WDNR indicates that the site remains open on the computer inventory. Hydro-Search has found that only two documents exist and has attached copies of both to this letter. The first document in the responsible party letter dated December 6, 1990 which indicates a Low Priority Ranking. The File Reference is 4440. The second document is a brief letter report dated January 3, 1991 summarizing Compliance Upgrade work at the UST and listing soil sample laboratory analyses results. The highest soil sample result is 49 ppm TPH (less than the current 100 ppm standard), and qualitative descriptions of soil odor and discoloration at the site suggested no petroleum release requiring further action existed. The consultant recommended no further action at the conclusion of the letter report.

As no evidence of soil contamination above current NR700 standards is known to exist and no evidence of ground-water impairment was found, Hydro-Search requests that site closure be granted and that this site be removed from the LUST inventory.

I trust this information meets your needs. If you have any questions, please do not hesitate to call.

Sincerely,  
HYDRO-SEARCH, INC.



Daniel L. Morgan, P.E.  
Manager, Storage Tank Services  
encl.  
cc: Rob Knighten (2 copies)



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Southeast District - Annex building

Post Office Box 12436  
4041 N. Richards St.  
Milwaukee, Wisconsin 53212  
TELEPHONE: 414-961-2727  
TELEFAX #: 414-961-2770

George E. Meyer  
Secretary

November 16, 1994

File Ref: 241280270  
LUST:ERR

Daniel Buss, PE  
CDM  
5215 North Ironwood RD. Ste. 250  
Milwaukee, WI 53217

Dear Mr. Buss,

RE: Response to CDM report:

"Draft Procedures for Pump Test" - October 3, 1994

The Department hereby approves the referenced proposed procedures for pump testing in the area of the Mitchell Field hydrant fueling tank pad. The test should be set up, conducted, and recorded with the anticipation of gaining empirical drawdown data both within the tank pad material and without. The empirical data should enable the project hydrogeologist to calculate sustained yield, specific capacity, specific yield/storativity, and hydraulic conductivity. The calculation of hydraulic conductivity will allow the project hydrogeologist to predict radial influence and plume capture at various discharge rates.

There was an indication during our September 12, 1994 meeting that the Department of Natural Resources would be receiving a pilot test proposal for bioremediation from CDM. The proposal was to include plans for the installation of the "bioremediation wells", plans for conducting air permeability testing, and plans for testing soils for existing nutrient and oxygen levels. The Department has not yet received the proposed pilot test plan.

On page 2 of the September 12, 1994 "Monthly Progress Meeting Notes", mention is made of a verbal proposal by CDM to use air injection instead of air extraction because "it is easier to control". This statement needs clarification. In my experience it is much easier to control volatile organic emissions by using extraction technology. Injection of air can cause migration of volatile organics and can result in discharge of untreated volatiles to the atmosphere. Please forward this letter to all appropriate CDM personnel.

Sincerely,

  
Charles J. Krohn  
Hydrogeologist



NOTE: DO NOT USE THIS FORM WHEN DOCUMENTING INSPECTIONS AT HAZARDOUS WASTE AND SOLID WASTE FACILITIES.  
SEE BACK SIDE OF THIS FORM FOR MORE INFORMATION.

|  |   |                             |
|--|---|-----------------------------|
| ATTN: <u>File</u>  |   | License Number<br>_____     |
| <input type="checkbox"/> Residuals Management SW/3                     | <input type="checkbox"/> District _____                 | EPA ID Number<br>_____      |
| <input type="checkbox"/> Hazardous Waste Management SW/3<br>Unit _____ | <input type="checkbox"/> Environmental Enforcement EE/5 | WI- _____                   |
| <input type="checkbox"/> Systems Management SW/3                       | <input type="checkbox"/> _____                          | Facility ID Number<br>_____ |

|                       |                          |                       |
|-----------------------|--------------------------|-----------------------|
| Facility/Company Name | Location (Address or ¼¼) | City, State, Zip Code |
|-----------------------|--------------------------|-----------------------|

|               |          |        |  |  |                               |
|---------------|----------|--------|--|--|-------------------------------|
| Facility Type | District | County | Contact Method<br><input type="checkbox"/> Telephone<br><input type="checkbox"/> In-Person | Date<br><u>11/07/94</u><br>M M D D Y Y | Time (24-Hour Clock)<br>_____ |
|---------------|----------|--------|--|--|-------------------------------|

|   |                                     |  |
|---|-------------------------------------|--|
| Facility Representative Contacted<br><u>Airport Group Meeting</u> | Title or Position of Representative | Telephone Number<br>(include area code)<br>( ) |
|---|-------------------------------------|--|

① 2 Bids on Advertisement for Bids (Contractor to be selected)

② 2nd week in March - Conclusion of plans for long term/short term glycol collection & treatment.

③ Conceptual plans includes 3 areas for glycol separation to phases. The areas would be constructed to collect the glycol which does not leave with the phase.

④ Focus money on the final plan - Forget the interim plan.

Check if additional sheets attached

By Ch. J. [Signature]

NOTE: DO NOT USE THIS FORM WHEN DOCUMENTING INSPECTIONS AT HAZARDOUS WASTE AND SOLID WASTE FACILITIES. SEE BACK SIDE OF THIS FORM FOR MORE INFORMATION.

|   |   |                                     |  |  |                               |
|---|---|-------------------------------------|--|--|-------------------------------|
| ATTN: <u>File</u>   |   |                                     |  | License Number<br>_____                    |                               |
| <input type="checkbox"/> Solid Waste Management SW/3      | <input type="checkbox"/> District _____                 |                                     | EPA ID Number<br>_____   |  |                               |
| <input type="checkbox"/> Hazardous Waste Management SW/3  | <input type="checkbox"/> Environmental Enforcement EE/5 |                                     | Facility ID Number<br>_____  |  |                               |
| <input type="checkbox"/> Emergency/Remedial Response SW/3 | <input type="checkbox"/> _____                          |                                     | _____  |  |                               |
| Facility/Company Name<br><u>Airport Meeting</u>           |   | Location (Address or 1/4 1/4)       |  | City, State, Zip Code<br><u>Milw., WI.</u> |                               |
| Facility Type<br><u>Airport</u>                           | District  | County<br><u>Milw.</u>              | Contact Method<br><input type="checkbox"/> Telephone<br><input type="checkbox"/> In-Person | Date<br><u>10 04 94</u><br>M M D D Y Y     | Time (24-Hour Clock)<br>_____ |
| Facility Representative Contacted                         |   | Title or Position of Representative |  | Telephone Number (include area code)       |                               |

Milw. County Airport Meeting - Dan Boone CDNR  
March 15, 1994 will be start date  
Comment on pumping test proposal and the  
bio-remed pilot test proposal.

Where is the draft bio proposal for pilot  
tests which are planned. (The bid document  
contains the tests)

Options to discuss interim actions concerning  
ethylene glycol recovery with Kazmierczak  
- concerning (when + how). Huge numbers  
involved with the proposals.

Workplan to be coming concerning bio-testing  
proposal.  
Next meeting Nov 7, 1994

Check if additional sheets attached

By Ch. J. [Signature]





DRAFT PROCEDURE FOR PUMP TEST  
FUEL LOADING FACILITIES  
MILWAUKEE AIRPORT  
MILWAUKEE, WISCONSIN

3 OCTOBER 1994

EXISTING CONDITIONS

The pump test will be conducted to determine the response of fluids within the existing granular backfill around the fuel storage tanks at the Greater Milwaukee Airport. The two fuel tanks were placed in an excavation of approximately 50-ft by 50-ft in plan dimension and approximately 15-ft deep. Drawings show that the two tanks are setting on a concrete mat foundation and are strapped to the foundation to prevent uplift. The tank excavation was filled with granular backfill material from the bottom of the excavation to the existing ground surface. The sides of the excavation were sloped at an unknown angle to the ground surface. The excavation area contains two sumps for the removal of fluids. Drawings show that the sumps are approximately 24-in. in diameter and extend from the existing ground surface to the bottom of the original excavation.

Previous studies at the fuel storage area resulted in the installation of monitor wells in the excavation area and the immediate area surrounding the excavation. Monitor wells in the excavation area are screened in the granular fill around the fuel tanks. Monitor wells in the surrounding area are screened in the native clay soils that form the sides and bottom of the excavation.

PRE-TEST MEASUREMENTS

RAINFALL- The intent is that the pump test be done during a rainfall free time to allow a determination of the recharge capacity of the native soil. For this reason, we will only perform the test 48-hrs after a rainfall event that can result in runoff to the excavation area. In addition, we will attempt to run the pump test in a 5-day period of time when no significant rainfall is expected. We will accumulate the rainfall and other pertinent meteorological data from the airport information center.

WATER LEVEL MEASUREMENTS - We will make water level measurements in the five existing monitor wells and sumps in the excavation area on a daily basis for one week prior to the beginning of the pump test. We will also make water level measurements in the selected monitor wells in the native soils in areas surrounding the excavation area at the same time. The monitor wells in the native soils will be MW-5U, MW-1, and MW-8U. We will analyze the data from the monitor wells to document the trend of water levels just prior to the performance of the pump test. If this determination cannot be made because the water level fluctuations in

the monitor wells is to uncertain because of weather conditions, the pump test will be delayed until the trend in monitor wells is certain.

## PUMP TEST PROCEDURE

**EQUIPMENT** - The pump will be a submersible pump with a capacity of no less than 7 gal/min. The pump will be installed in the existing sump near the center of the existing excavation. Fluid pumped from the sump will be conveyed to temporary storage tanks using hoses and or piping that is free from leaks. All hoses and/or piping will be above ground. Observations will be made of the condition of the fluid conveyance system. Should any leaks be observed, the pump test will be discontinued until the leak is sealed. All fluid will be conveyed through a water meter located near the temporary storage tanks. The temporary storage tanks will have a combined storage capacity of approximately 60,000 gallons. The volume of water pumped to any of the tanks will not exceed 95% of the recommended storage for the particular tank.

**PROCEDURE** - The pump test is intended to continue for a period of no longer than 5-days or for the period of time necessary to result in a total drawdown in the excavation area of 75% of the total depth of fluid initially occurring in the excavation area. The pump will be installed as close to the bottom of the original excavation as possible.

The pump test will occur in two phases. The first phase will involve a step test procedure to evaluate the response of the system to varying rates of pumping. The rates will be 1 gal/min, 3 gal/min, 5 gal/min, and 7 gal/min. The test will be conducted at each of the rates for a duration of one hour. Water level measurements will be made immediately before, during, and immediately after each of the steps to make an estimate of the drawdown rate. We will select a pumping rate for the actual pump test that will result in a drawdown rate of about 1-ft/day to 2-ft/day. The second step will be the continuous phase of the pump test where the pump will be operated at a steady state selected in the first phase for a sufficient period of time to achieve a drawdown of 75% of the initial depth of water in the excavation.

We will measure water levels in the monitor wells and in the sump on a regular interval throughout the test. For the first 16-hrs, the interval will be hourly or sooner for monitor wells in the excavation. For the balance of the test, we will measure water levels on 2-hr intervals for the first 8-hrs, 4-hr intervals for the next 24 - hrs and at 8 - hr intervals until the completion of the pumping phase of the test.

When the pumping is completed, we will make final measurements in the monitor wells to determine maximum levels of drawdown. We will continue to measure water levels in the monitor wells on a once per day basis as the water levels in the wells recover.

Will K values be able  
to be calculated

## DATA ANALYSIS

We will reduce all water level data to determine water surface elevation in each of the wells at the time of the measurement. The data will be presented on various types of graphs and tables to allow a determination of the response of the fluid in the backfill to the selected pumping rate. The response will be used to evaluate design criteria for the permanent sump construction and operation in the fuel unloading facilities.

## FLUID SAMPLING DURING THE PUMP TEST

Samples of the fluid removed from the sump will be taken at regular intervals throughout the duration of the pump test and recovery. Samples will be taken at about 4-hr intervals for the first 16-hrs and at about 8-hr intervals for the rest of the pump test. During the recovery phase, we will take one sample every 24-hrs for the first two days of recovery and at 48 to 72-hr intervals thereafter for a period not longer than two weeks.

Samples of fluid will be tested for BETX compounds. Other constituent and index testing may be performed that could enhance our ability to determine treatability design criteria and to estimate the rate at which these constituents may be removed by the pumping of fluids from the backfill.



# Foth & Van Dyke

Two Park Plaza, Suite 950  
10850 West Park Place  
Milwaukee, WI 53224-3619  
414/359-2500  
FAX: 414/359-2519

January 3, 1991

Mr. Robert L. Knighten, Civil Engineer  
Milwaukee County  
Department of Public Works  
Engineering, Environmental & Energy Services  
Courthouse Annex, Room #314  
907 North 10th Street  
Milwaukee, Wisconsin 53233

90M17

Dear Mr. Knighten:

RE: General Mitchell International Airport (GMIA)  
Baggage Claim Fuel Oil Tank (A-33)  
Compliance Upgrade

Presented herein are the results of a compliance upgrade site assessment of the underground fuel oil tank located at the GMIA Baggage Claim Building at 5300 South Howell Avenue, Milwaukee, Wisconsin. The purpose of this assessment was to evaluate whether soil and/or groundwater contamination was evident within the underground storage tank (UST) excavation. The methods and results of our assessment are included in the following report:

## BACKGROUND INFORMATION

The 1,500-gallon fiberglass single-wall UST located at the Milwaukee County Airport Baggage Claim Building has been in-place for approximately 8 years and is used to provide fuel oil to the boiler of the baggage claim facility.

## REGIONAL AND LOCAL GEOLOGY AND HYDROGEOLOGY

The geology of Milwaukee County, Wisconsin is characterized by quaternary aged unconsolidated glacial deposits (i.e. clayey, silty tills, and sand and gravel outwash) ranging in thickness from 35 to 200 feet overlying a thick (>2,000 feet) sequence of Silurian, Ordovician, and Cambrian aged dolomite, shale, and sandstone. Precambrian granitic rocks underlie the sedimentary sequence. Subsurface conditions encountered at the site consisted of reddish brown clay to a depth of eight feet. Topographic and sedimentological evidence seem to indicate that soils in the local area were derived from glacial drift and consist of glacial till and partially sorted ice contact deposits associated with kettle-moraine features.

Engineers  
Architects  
Planners  
Scientists

Mr. Robert L. Knighten  
Milwaukee County  
January 3, 1991  
Page 2

Groundwater was not encountered. However, according to data gathered by Foth & Van Dyke's installation of wells at the airport, groundwater ranges from approximately 6 to 20 feet below the ground surface.

#### COMPLIANCE UPGRADE

JEPA, Inc. was contracted to perform the compliance upgrade of the tank and piping at this location. Foth & Van Dyke conducted site assessment activities on November 1, 1990. No odors or soil staining was observed in the excavated areas.

#### SOIL SAMPLING

Soil samples were taken from 2 locations, approximately 1 to 2 feet beneath the piping in native soils. (See Attachment 1 for sample location map).

| Sample No.  | Location                          | Depth (ft.) | Soil               | TPH-GC (ppm) |
|-------------|-----------------------------------|-------------|--------------------|--------------|
| MC-SS-01-PR | 2' from pipe entry into building  | 1.5         | Reddish Brown Clay | 20.0         |
| MC-SS-02-PR | Northwest of tank at piping elbow | 1.5         | Reddish Brown Clay | 49.0         |

A stainless steel sample spoon was used to collect both samples which were placed in 120-ml glass sample jars. The jars were filled completely with no headspace and placed on ice according to approved sampling techniques. The samples were thermally preserved during transportation and were sent with proper chain-of-custody documentation and analysis request forms to a Wisconsin Department of Natural Resources (WDNR) approved laboratory. (See Attachment 2 for Chain-of-Custody form).

#### SAMPLE ANALYSIS

Both of the samples were analyzed for total petroleum hydrocarbons by gas chromatography (TPH-GC). Laboratory results revealed a TPH level of 20.0 ppm for Sample MC-SS-01-PR and a TPH level of 49.0 ppm for Sample MC-SS-02-PR. (See Attachment 3 for laboratory results).

Mr. Robert L. Knighten  
Milwaukee County  
January 3, 1991  
Page 3

CONCLUSIONS AND RECOMMENDATIONS

The following summary is based on information gathered by Foth & Van Dyke personnel and represent interpretations of field and laboratory results:

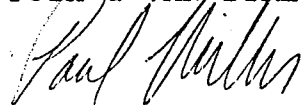
- . Staining was not evident on excavated soils.
- . Analytical results indicate that TPH concentrations range from 20 - 49 ppm at the site.

Based on the conclusions presented above, petroleum contamination of soil above the WDNR action limit appears to be present. The relatively low levels of contaminants present in the soil samples indicate a limited contaminated area. However, due to the known background contamination at this location and the limited public access to this location, Foth & Van Dyke recommends no further action be required for the site.

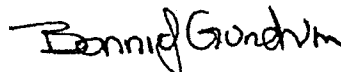
If you have any questions, please feel free to contact our office.

Sincerely,

FOTH & VAN DYKE



Paul E. Miller  
Engineering Technician



Bonnie J. Gundrum, CHMM  
Section Manager

PEM:BJG:kll

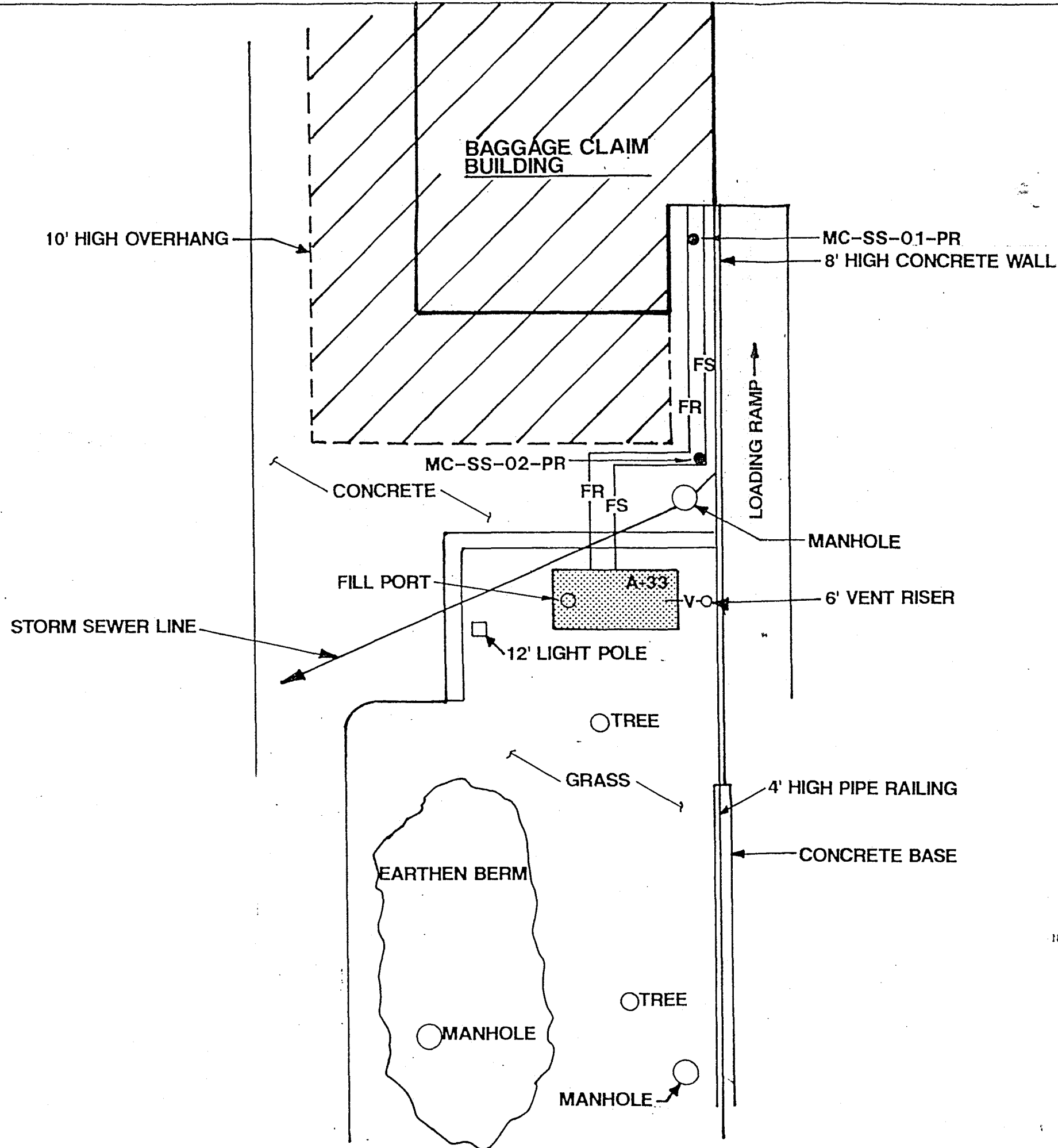
Enclosure

cc: Chip Krohn - WDNR/SED



ATTACHMENT 1

Sample Location Map



### AIRPORT-BAGGAGE CLAIM

NOTE: Underground piping and utilities shown are based on field surveys only. Contractor is responsible for verifying and protecting all underground utilities during excavation and construction.



|                              |                   |
|------------------------------|-------------------|
| <b>MILWAUKEE COUNTY</b>      |                   |
| 5300 S. HOWELL AVE.          |                   |
| MILWAUKEE                    |                   |
| SCALE: 1"=10'-0"             | DATE: APRIL, 1990 |
| PREPARED BY: FOTH & VAN DYKE | BY: J.M.G.        |

ATTACHMENT 2

Chain-of-Custody Form



# CHAIN OF CUSTODY RECORD

No.: 4101

Client: Foth, Van Dyke Milwaukee

Project No.: 10117 Milwaukee County

Sampling Site: Wish. Co. Airport

Sampler: PEM

9011021

Bottle Size | Preservative

|                     |  |  |  |  |  |  |  |
|---------------------|--|--|--|--|--|--|--|
| <u>170 ml glass</u> |  |  |  |  |  |  |  |
|---------------------|--|--|--|--|--|--|--|

Packed by: \_\_\_\_\_ Seal #: \_\_\_\_\_

Seal Intact Upon Receipt by Sampling Co:  Yes  No

Condition of Contents: \_\_\_\_\_

Sealed for Shipping by: \_\_\_\_\_

Initial Contents Temp: 4 °C Seal #: \_\_\_\_\_

Seal Intact Upon Receipt by Laboratory:  Yes  No

| Date | Time  | Sample I.D./Description |   |  |  |  |  | Bottle Total | Sample Type | Lab Use Only | Remarks                                      |
|------|-------|-------------------------|---|--|--|--|--|--------------|-------------|--------------|--|
| 11-1 | 11:10 | ML-SS-01-PR             | ✓ |  |  |  |  | 1            | grab        | 106323       |  |
| 11-1 | 11:15 | ML-SS-02-PR             | ✓ |  |  |  |  | 1            | grab        | 106324       |  |
| 11-1 | 11:35 | ML-SS-03-SP             | ✓ |  |  |  |  | 1            | grab        | 106325       |  |
| 11-1 | 11:40 | ML-SS-03-SP             | ✓ |  |  |  |  | 1            | grab        | 106326       | SAMPLE & ANALYSIS REQUEST LIST THIS AS 04-SP |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
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|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |
|      |       |                         |   |  |  |  |  |              |             |              |  |

| Custody Transfers   |             |              |              |       |       |
|---|-------------|--------------|--------------|-------|-------|
| Relinquished by:  | Date:       | Time:        | Received by: | Date: | Time: |
| 1. <u>[Signature]</u>   | <u>11-2</u> | <u>11:00</u> |              |       |       |
| 2. _____  | _____       | _____        | _____        | _____ | _____ |
| 3. _____  | _____       | _____        | _____        | _____ | _____ |
| 4. _____  | _____       | _____        | _____        | _____ | _____ |
| Received for Laboratory: <u>[Signature]</u> <u>11/2/90</u> <u>11:00</u> |             |              |              |       |       |

| Shipping Details   |
|--|
| Method of Shipment: <u>LIPS OVERNITE</u>   |
| Condition of Contents: <u>GOOD</u>   |
| Contents Temperature: <u>4</u> °C  |
| ORTEK Project No.: _____   |
| <b>ORTEK</b><br>2496 W. Mason<br>Green Bay, Wisconsin 54303<br>Phone: 414/498-2222 Fax: 414/498-4067 |

ATTACHMENT 3

Laboratory Results



ENVIRONMENTAL LABORATORY

414-498-2222  
FAX: 414-498-4067

- SAMPLE ANALYSIS REPORT -

To: FOTH & VAN DYKE  
10850 W PARK PLACE  
SUITE 950  
MILWAUKEE WI 53224

Attn: PAUL MILLER

Batch ID : 9011021  
Our Lab # : 106323  
Your Sample ID: MC-SS-01-PR  
Sample Matrix : SOIL

Report Date: 11/21/90

COLLECTION INFORMATION

Date/Time/By: 11/01/90 11:10 PEM  
Location : MILW CO AIRPORT

| Lab#   | test                        | Result | Units |
|--------|-----------------------------|--------|-------|
| 106323 | Total Petroleum Hydrocarbon | 20.0   | MG/KG |

Signed

*David J. DeCarlo*

Date

11-21-90

Signed

Date



- - SAMPLE ANALYSIS REPORT - -

To: FOTH & VAN DYKE  
10850 W PARK PLACE  
SUITE 950  
MILWAUKEE WI 53224

Attn: PAUL MILLER

Batch ID : 9011021  
Our Lab # : 106324  
Your Sample ID: MC-SS-02-PR  
Sample Matrix : SOIL

Report Date: 11/21/90

COLLECTION INFORMATION

Date/Time/By: 11/01/90 11:15 PEM  
Location : MILW CO AIRPORT

| Lab#   | test                        | Result | Units |
|--------|-----------------------------|--------|-------|
| 106324 | Total Petroleum Hydrocarbon | 49.0   | MG/KG |

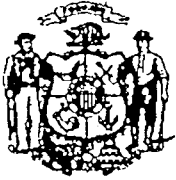
Signed

Date

11-21-90

Signed

Date



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Carroll D. Besabny  
Secretary

Box 12436  
Milwaukee, Wisconsin 53212  
Fax: (414) 263-8483

December 6, 1990

File Ref: 4440

Mr. Robert Knighton  
Milwaukee County Civil Engineering  
Courthouse Annex  
907 North 10th Street, Room 314  
Milwaukee, WI 53233

Dear Mr. Knighton:

RE: Milwaukee County Airport - Baggage Claims, 5300 S. Howell Avenue,  
Milwaukee, WI

A-33

The Wisconsin Department of Natural Resources (WDNR) has been notified that petroleum contamination was discovered November 1, 1990 at the above referenced location. Charles Krohn, the Leaking Underground Storage Tank (LUST) Project Manager for your area, may be reached at the above address or at (414) 263-8666. Based on the site specific information provided, this case has been assigned to the Low Priority Rank group. The purpose of this letter is to inform you of your legal responsibilities to address this situation.

Releases from underground storage tanks regulated under Subtitle I of the Resource Conservation and Recovery Act require compliance with the provisions of 40 CFR Parts 280 and 281. The Environmental Protection Agency (EPA) has the authority to take enforcement action at any time, but will generally not take action against parties cooperating with the state. The WDNR proceeds in LUST cases under the authority of s. 144.76, Wisconsin Statutes, commonly referred to as Wisconsin's Hazardous Substance Spill Law. The definition of "hazardous substance" as found in s. 144.01(4m), Wisconsin Statutes, includes petroleum products.

Wisconsin Statute 144.76(2a) states: "A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall notify the Department immediately of any discharge not exempted under sub.(9)."

Wisconsin Statute 144.76(3) states: "A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of this state."

Mr. Robert Knighton - December 6, 1990

Because you possess or control a hazardous substance which has been released to the environment, the Department identifies you as the party responsible for taking the actions necessary to restore the environment. You are required to:

1. Immediately notify your WDNR Project Manager, or the Spills Hotline at (414) 263-8491 should emergency conditions involving explosive vapors and/or well contamination develop.
2. Conduct an investigation to determine the extent of soil and groundwater contamination.
3. Remediate all of the environmental impacts caused by this situation.

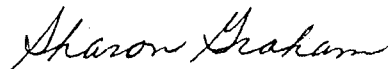
Within 30 days of receiving this letter, you should provide your WDNR Project Manager with the date the remedial investigation will begin.

Final documentation of the investigation and cleanup should be prepared according to the guidance enclosed and sent to this office on completion of compliance with all applicable federal, state and local laws and regulations. Remedial actions must adequately cleanup contaminated soil and/or groundwater to current WDNR guidelines and/or standards. All product, soil, wastewater, and sludge must be disposed of in compliance with all applicable federal, state and local laws and regulations. Because the Department is experiencing a backlog of leaking underground storage tank cases of emergency status and your case is not currently ranked as an emergency, your submittals will be reviewed as time permits. Investigation and cleanup should not, however, be delayed pending WDNR review of your case.

You are encouraged to contact the Department of Industry, Labor, and Human Relations (DILHR), the state agency that administers the Petroleum Environmental Cleanup Fund (PECFA). This fund may reimburse you for eligible costs associated with the remedial investigation and cleanup. DILHR should be contacted at (608) 267-4545 to obtain current information regarding the PECFA program.

Your cooperation in this matter will be appreciated. Please be aware that your ability to use PECFA funds is dependent on your cooperation in adequately addressing this problem. If you have any questions, please contact your WDNR Project Manager.

Sincerely,



Sharon Graham  
Program Assistant, Environmental Repair Section

SG:jw

Enclosures: Remedial Investigation Checklist  
Application to Treat or Dispose of Petroleum Contaminated Soil

c: Paul Miller - Foth & Van Dyke  
SED Case File

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