Rationale for No Action Required Date stamped: 9/16/2002 Requested Date reviewed: 11/7/02 Name and description of site: Engine Test Stand near outfall 004 - SE corner (incl. County, size...) of Mitchell Airport - Airforce Reserves 300 E. Collège Ave. - Milwaukee Who is submitting and for whom? (Gonsultant and client) Monica Lewis & Royal Eclestein Chief, Environmental Flight What has been submitted? Notification, further description, 9 Sample results, Site map Description of contamination: JP 8 Jet Fuel Any references to other documents available, but not submitted? What is being requested? procedures to prevent future occurrences are in place. 09-41-378567

Please copy to Walt

Signed: Michelle listhams

FAX NO. : 4144825609

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DEPARTMENT OF THE AIR FORCE AIR FORCE RESERVE COMMAND



16 Sep 2002

440 SPTG/CEV General Mitchell International Airport Air Reserve Station (GMIAP-ARS) 300 East College Milwoukee, WI 53207

SER R&R Program Assistanct Wisconsin Department of Natural Resources SE Region HQ 2300 North Martin Luther King Blvd Milwaukee, WI 53212

Greetings,

The purpose of this letter is to report on 1) JP-8 aircraft fuel release incidents that have been occurring over the last two years at the GMIAP-ARS Engine Test Stand (ETS), 2) the recent action taken to investigate the consequences of the spills, and 3) the actions GMIAP-ARS is taking to prevent reoccurrence. GMIAP-ARS requests the WDNR Spill Coordinator review all submitted information and approve closure of the incidents, if applicable.

The attachments submitted include the following:

Morjica Lus &-

Attachment 1 - DNR Form 4400-225

Attachment 2 - Letter summarizing Sampling and Analysis results

Attachment 3 - Sampling and Analysis Results

Attachment 4 - Map depicting release location and sampling locations

Additionally, in reviewing the submittal requirements on the form, future identifications of non-emergency releases will be submitted immediately. This form and the requirement will be added to GMIAP-ARS's Hazardous Material Emergency Response Plan. Currently, it only addresses emergency type spills

If further information or discussion is needed, please contact me at (414) 482-6151 or email monica.lewis@generalmitchell.af.mil.

Sincerely,

Monica Lewis

Chief, Environmental Slight

DNR7411 WAUKEE WT \$3212 + 94825609

NÜ, 397

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ARS)

State of Wisconsin Department of Natural Resources

Hazardous Substance Relaces Fax Notification (Non-Emergency Only)

Form \$400-238 (\$403) Page | of 2

Emergency Releases / Spills must be reported via the 34-hour Hotline: 1-600-843-0003

Notice: Hazardaus substance discharges must be reported immediately according to the "Spills Law", a. 292.11 Wis. State. Section NR 706.05(1)(b), Wis. Adm. Code requires that hazardous substance discharges are to be reported by one of three methods: telephoning the Department (toll free Spill Hotline number above), telefaxing a report to the Department or visiting a Department office in person. If you choose to notify the Department by telefax, you should use this form to be sure that all necessary information is included. However use of this form is not mandatory. Under a 292.99, Wis. State., the penalty for volating on: 292 Wis. State., shall be no less than \$10 nor more than \$5000 for each violation. Each day of continued violation is a separate offerse. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than program administration. However, information submitted on this form may also be made evaluable to requesters under Wisdonato's Open Records Law (se. 18.31 – 18.39, Wis. State.).

Confirmatory laboratory date should be included with this form, to assist the DNR in processing this Hazardous Substance Release Notification.

Complete this form. TYPE of Pl discovery of a potential release I Undarground Petroleum: Aboveground Petroleum	from (check one): Storage Tank System Storage Tank System					3QA
Underground Petroleum Aboveground Petroleum Dry Gleaner Facility (DEF Other - Describe: Engi	iP eligibility based o n: [.ne Test Stand (] Faoility owner/ope [ETS] — releas	vator[]Propert ses occurre	y owner of lie datatr	ensed facility craft envin	ie shut-
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Monica Lewis	Natio	onal Airport-	Air Force	Reserves	16 Sep 2	2002
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i.e., 1/4 mile NW of CTHs 60 M Corner of Approvential Municipality (City, Village, Tow City of Milwaukee, W County: Legal I Milwaukee 3. Responsible Party (RP	ly occurred at manip Spacify municip (I sconstn Deuarlption: 4	GMTAP-ARS Out willy in which the sit of 2° 56.8° nort 1/4, Section	fall 004 r sin tocates, ng h lar frude	near Engi Imaling add	ne Test Sta <u>ress/cily</u> .8' west lo	ngitude
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State of Wisconsin Hazardoua Substanca Rolesso Fex Notification Department of Natural Resources (Non-Emergency Only) Form 4400-225 (8/02) Page 2 of 2 Chlorinated Solvents Hydraulia Fuel RCRA Hazardous Waste ☐Hydrocarbon-Unknown Type TPAH'8 SVOC (Semi-volatile Organic Compound) []Chromium CLeannate []Solvent MYBE-Methyl Tertlary Buryl Ether □Cyanide ☐Stoddard Bolvent Diesel []Mercury Transformer Fluid [[Fartilizer [Motels (apacity): CUnknown [Fuel OII **DMIK** CIVOC's Petrolaum-Unknown Type DOIL & Greace []Weste Oil Cother (apedly): JP-8 Jet Fuel Gasoline-Lead Unknown Gesoline-Leaded Impacts to the environment (enter 'K" for known/confirmed or "P" for potential for all that apply) Sentery Sawer Contamination ___ Contamination in Row of Way ___ Air Contamination P Soil Contemination ___ Co-contamination ___ Direct Contact ___ Expanding Plume Concrete/Asphalt Storm Sewer Contamination ___ Fire Explosion Threat P_ Surface Water Contamination ____Contained/Recovered Contamination Within 1 Meter of Bedrock Within 100 ft of Private Wall Free Product Contaminated Private Well ___ Groundwater Contamination Within 1000 ft of Public Well Contaminated Public Well ___Off-Site Contamination Contamination in Fractured Redrock Other Contamination was discovered as a result of: Other - Describe: project to correct containment prob Tiste assessment Tank closure assezement Date 7/27/02 Lab rasults:

Additional Comments: Include a brief description of immediate actions taken to halt the release and contain or cleanup hazardous substances that have been discharged During a construction project to replace faulty valve at Engine Test Stand, another pipe was located which appeared connected to a drain under Engine Test Stand (ETS). Discussion with ETS personnel indicated they were releasing about a quart of fuel to the drain as it connected to the oil/water separator. The separator had been removed. It is estimated 4 releases a year over the last 4 years has occured totalling 4-6 gallons. Personnel have been briefed on correct collection procedures of fuel. Storm **

FAX numbers to report non-amergency releases in DNR's five regions are us follows:

Northeast Region (920-492-6669); Attention - RR Program Assistant:

Lab results will be faxed upon receipt

Brown, Calumet. Door. Fond du Lac (except City of Weupun - see South Carriet Region), Green Lake, Kewaunee, Manitowoc, Merinette. Merquette, Menominee, Oconto, Outegamie. Shaweno, Weupace, Wauchere, Winnebago Counties.

Northern Region (715-366-8632); Attention - RR Program Assistant:

Ashland, Berron, Bayrield, Surnett. Douglas, Forest, Florence, Iron, Langlade, Lincoln, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vites, Washburn Counsies

South Control Region (668-276-3336); Attention - RR Program Assistant:

Columbia, Crawford, Denu, Dodge, Fond du Lac (Chry of Waupun only), Grant, Green, Iowa, Jefferson, Lahayetto, Richland, Rock, Sauk Countles

Southeast Neglon (414-263-4483); Attention - RR Program Assistant:

Kanosha, Milwaukea, Oxaukea, Racina, Bhaboygan, Walworth, Washington, Waukesha Counties

West Central Region (716-939-6076); Attention - RR Program Assistant:

Adams, Buffalo, Chippewa, Clark, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Papin, Pierce, Portage, St. Croix, Trempagleau, Vernon, Wood Counties

Water Pollution Prevention Plan (SWPPP) and Haz Mat Emergency Response Plan have been updated to reflect current condition of ETS. All ETS personnel, supervisors, and respective Commanders have been briefed on the incident, appropriate coprational procedures for collecting residual fuel and its correct disposition (designated storage container at the Engine Test Shop, Bldg 208.) All ETS personnel were also sent to SWPPP training which cover the hazards of discharging to the storm water and specific spill contingency requirements



DEPARTMENT OF THE AIR FORCE

AIR FORCE RESERVE COMMAND

26 July 2002

MEMORANDUM FOR: 440 SPTG/CEV

FROM: 440 SPTG/SGPB

SUBJECT: Engine Test Stand Environmental Sample Analysis Results

1. Attached are the results from environmental sampling and sample analysis as requested by CEV. Per CEV request, environmental samples were taken at three points downstream from the aircraft engine test stand for GRO, DRO, BTEX, O&G, BOD, and TSS. There was no noticeable petroleum appearance or smell during sampling. All samples were taken by the grab method. The following values were returned:

Sample No., Location	Test	Result	Units	Method
GN020026 engine test stand outfall	TSS	7	mg/l	EPA 160.2
GN020027 engine test stand outfall	BOD	< 2	mg/l	SM5210B
GN020028 engine test stand outfall	0 & G	< 2	mg/l	EPA 413.1
GN020029 engine test stand outfall	GRO	< 3.3	mg/Kg	WDNR 8021
GN020030 engine test stand outfall	DRO	< 3.3	mg/Kg	WDNR 8021
GN020031 midway between engine test stand and storm conduit under runway	GRO	€ 3.3	mg/Kg	WDNR 8021
GN020032 midway between engine test stand and storm conduit under runway	DRO	< 3.3	mg/Kg	WDNR 8021
GN020033 between engine test stand and samples before runway storm conduit	GRO	< 3.3	nig/Kg	WDNR 8021
GN020034 between engine test stand and samples before runway storm conduit	DRO	< 3.3	mg/Kg	WDNR 8021

 Questions and comments regarding this report can be directed to the undersigned at x5240 or royal.eckstein@generalmitchell.af.mil.

> R. Eckiteria ROYAL ECKSTEIN Industrial Hygienist

Attachmenis:

1. Laboratory Results



A Subsidiary or Sommer-Frey Laboratories, inc

440 AW SPTG/PB

Attn: Royal Eckstein

300 East College Avenue

Milwaukee, WI 53207-6299

Received Date: 7/9/02

Report Date: 7/22/02

Page 1 of 3

- Analytical Results -

	~ Milalytical	Kepuir	, =					
Lab #: 02A3693-001	Sample ID: GN02	0021 GRAE	3 07/09	/02				
Test Total Xylenes Toluens Ethylbenzene Benzene	Result Units <0.66 ug/L <0.33 ug/L <0.33 ug/L <0.33 ug/L <0.33 ug/L	LOD 0.66 0.33 0.33 0.33	LOQ 2 1 1	Analysis Date 7/16/02 7/16/02 7/16/02 7/16/02	Ву	81 81 81 81	Method 8021 8021 8021 8021	Flag S S S S
Lab #: 02A3693-002	Sample ID: GN02	0025 GRAE	3 07/09	/02				
Teat Total Xylenes Toluene Ethylbenzene Benzene	Result Units <0.86 ug/L <0.33 ug/L <0.33 ug/L <0.33 ug/L <0.33 ug/L	LOD 0.66 0.33 0.33 0.33	2 1 1	Analysis Date 7/16/02 7/16/02 7/16/02 7/16/02	Ву	81 81 81	Method 8021 8021 8021 8021	Flag S S S S
Lab#: 02A3693-003	Sample ID: GN020	0029 GRAE	3 07/09	· /02				
Test Total Xylenes Toluene Etnylbenzene Benzene GRO	Result Units <0.0166 mg/Kg <0.0083 mg/Kg <0.0090 mg/Kg <0.0083 mg/Kg <3.3 mg/Kg	LOD 0.0166 0.0083 0.0090 0.0083 3.3	0.050 0.025 0.025 0.025 0.026 10	Analysis Date 7/12/02 7/12/02 7/12/02 7/12/02 7/12/02	Ву	61 61 61	Method 8021 8021 8021 8021 WDNR	Flag 1 S S S
Lab #: 02A3693-004	Sample ID: GN020	0031 GRAE	3 07/09	/02				
Test Total Xylenes Toluene Ethylbenzene Benzene GRO	Result Units <0.0166 mg/Kg <0.0083 mg/Kg <0.0090 mg/Kg <0.0083 mg/Kg <3.3 mg/Kg	LOD 0.0166 0.0083 0.0090 0.0083	LOQ 0.050 0.025 0.025 0.025	Analysis Date 7/12/02 7/12/02 7/12/02 //12/02 7/12/02	Ву	B1 B1 B1 B1	Method 8021 8021 8021 8021 WDNH	Flag S S S S S S S

6125 West National Avenue, P.O. Box 14513, Milwaukee, Wisconsin 53214 (414) 475-6700 FAX: (414) 475-7216

Toll-Free: 800-300-6700



A Subsidiary of Sommer-Frey Laboratories, the

Page 2 of 3

- Analytical Results -

Lab#: 02A3693-005	Sample	ID: GN0200	33 GRAI	3 07/09	7/02			
Test Total Xylenes Toluene Ethylbenzene Benzene GRO	<0.0083 <0.0090	Unit# 5 mg/Kg 8 mg/Kg 0 mg/Kg 8 mg/Kg mg/Kg	LOD 0.0166 0.0083 0.0090 0.0083 3.3	LOQ 0,050 0.025 0.025 0.025 10	7/12/02	8y 81 81 81 81 81	Method 8021 8021 8021 8021 WDNR	Flag S S S S
Lab #: 02A3693-006	Sample	ID GN0200	22 GRAI	3 7/9/0:	2			
Test Blochemical Oxygen Demand	Result <2	Units mg/L	S FOD	LOQ 6.4	Analysis Date 7/15/02	By DZ/DM	Method SM5210B	Flag <
Lab #: 02A3693-007	Sample	ID: GN0200	124 GRAI	3 7/9/0:	2			
Test Brochemical Oxygen Demand	Result <2	Units mg/L	LOD 2		Analysis Date	By DZ/DM	Method SM5210B	Flag
Lab #: 02A3693-008	Sample	ID: GN0200	27 GRAI	3 7/9/0:	2			
Test Biochemical Oxygen Demand	Result ≺2	Units mg/L	ron Con	LOQ 6.4	Analysis Date 7/15/02	By DZ/DM	Method SM52†0B	Flag
Lab #: 02A3693-009	Sample	ID: GN0200	23 GRAI	3 07 /09)/02			
Yest O⊬& Grease	Result </td <td>Units mg/L</td> <td>LOD 2</td> <td>LÖQ 6.4</td> <td>Analysis Date 7/10/02</td> <td>Ву НМ</td> <td>Method 413.1</td> <td>Flag</td>	Units mg/L	LOD 2	L ÖQ 6.4	Analysis Date 7/10/02	Ву НМ	Method 413.1	Flag
Lab #: 02A3693-010	Sample	ID: GN0200	28 GRAI	3 0 7/09	1/02			
Test Oil & Groase	Result	Units mg/L	LOD 2		Analysis Date 7/10/02	Ву НМ	Method 413.1	Flag
Lab #: 02A3693-011	Sample	ID: GN0200	26 GRAE	3 7/9/0:	2			
Test Tss	Result 7	Units mg/L	LOD 1	LOQ 3.2	Analysis Date 7/15/02	Ву ОЈМ	Method 160.2	Flag 1

6125 West National Avenue, P.O. Box 14513, Milwaukee, Wisconsin 53214 (414) 475-6700 FAX: (414) 475-7216

Toll-Free: 800-300-6700



A Substituting of Sommer-Frey Laboratories, inc.

Page 3 of 3

- Analytical Results -

Lab #: 02A3693-012	Sample ID: GN02	0030 GRAB 07/09/02			
Test DRO	Result Units ≺3.3 mg/Kg	LOD LOQ Analysis Date 3.3 10 7/16/02	Вy	Method BI WDNR	Flag S
Lab #: 02A3693-013	Samole ID: GN02	0032 GRAB 07/09/02			
Test DRO	Result Units <3.3 mg/Kg	LOD LOQ Analysis Date 3.3 10 7/16/02	ёу	Method BI WDNR	Fläg S
Lab #: 02A3693-014	Sample ID: GN02	0034 GRAB 07 /09/02			
T est DRO	Result Units <3.3 mg/Kg	LOD LOQ Analysis Date 3.3 10 7/16/02	Ву	Method BI WDNR	Flag S

FLAG	Comment
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- All laboratory QC requirements were met for this sample.
- 2 A high blank recovery occurred during the analysis of this sample.
- 3 A high standard recovery may indicate a high bias on sample recovery
- A low standard recovery may indicate a low bias on sample recovery.
- 5 A high spike recovery was associated with this sample
- A low spike recovery was associated with this sample
- 7 This result is greater than our LOD (Limit of Detection) and less than our LOG (Limit of Quantitation).
- 8 A replicate performed on the set of samples including this sample was out of control.
- 8 Analysis performed by sub-contract lab. This sample analyzed by Braun Interfec Corporation, Wisconsin certification number: 999462640

Edward L. Kelley
Environmental Chemist

6125 West National Avenue, P.O. Box 14513, Milwaukee, Wisconsin 53214 (414) 475-6700 FAX: (414) 475-7216

Toll-Free: 800-300-6700

FAX NO. : 4144825609

2002 11:

FERM:

ACH "

Williams, Michelle L

From:

Eckstein Royal W Civ 440 SPTG/PB[SMTP:Royal.Eckstein@generalmitchell.af.mil]

Sent:

Friday, September 27, 2002 3:20 PM

To:

Williams, Michelle L.

Cc:

Lewis Monica Civ 440 SPTG/CEV; Cavil Thomas J Civ 440 MSS/SGP

Subject:

RE: samples taken at Engine Test stand 7/26/02

Michelle, I attempted to respond to your inquiry by phone. The following is provided as follow-up.

We performed environmental sampling/sample analysis at the outfall site for the engine test stand, with additional sampling and analysis at two locations downstream from the site. Analysis performed was TSS, BOD, O&G, GRO, and DRO. The TSS result was 7 mg/l, all other results were below detectible limits.

Hope this helps.

Royal Eckstein 440 Bioenvironmental Engineering Services GMIAP-ARS (414) 482-5240

----Original Message-----

From: Williams, Michelle L [mailto:Michelle.Williams@dnr.state.wi.us]

Sent: Tuesday, September 17, 2002 11:03 AM To: 'royal.eckstein@generalmitchell.af.mil'

Subject: samples taken at Engine Test stand 7/26/02

Dear Royal:

I am trying to get more information regarding the sampling locations at Engine Test Stand for the JP-8 Jet fuel releases over the past 4 years. It appears that releases were dumped in a drain that people thought was connected to a oil-water separator that had been removed. It appears that spills were infrequent (4 times per year) and of minimal amounts(one quart at a time), but if they were going into the soil, it needs to be treated as one historic spill. Did these spills only go into the drain? Did some/all of it end up in the soil or did it hit an impervious surface? If it was soil, were any samples analyzed? If you could explain the situation a little more, I can make a determination whether or not more investigation would be required.

Thanks very much,

Michelle Williams
WDNR Hydrogeologist
phone:(414) 263-8564
fax: (414) 263-8483
NEW E-MAIL ADDRESS AS OF 6/16/02:
MICHELLE.WILLIAMS@DNR.STATE.WI.US

Williams, Michelle L

From:

Lewis Monica Civ 440 SPTG/CEV[SMTP:Monica.Lewis@generalmitchell.af.mil]

Sent:

Monday, September 30, 2002 9:01 AM

To:

Williams, Michelle L

Cc:

Cavil Thomas J Civ 440 MSS/SGP; Eckstein Royal W Civ 440 SPTG/PB; Lavey Steven G Civ 440 SPTG/CE

Subject:

RE: samples taken at Engine Test stand 7/26/02

Hi Michelle,

I just saw the email traffic on the subject spill. Although Royal sent you some information on the analysis that was completed, I believe your specific questions still need addressing. I investigated the incidents and submitted the report. Therefore, the following is provided in response to your questions.

- 1. Did these spills only go into the drain? These spills were releases into a pvc pipe that connected/drained into a metal stormwater culvert and then flowed out to the base stormwater outfall 004. The outfall is a natural drainage ditch with sediment and grass.
- 2. Did some/all of it end up in the soil or did it hit an impervious surface? From the description in question 1, the spills initially hit an impervious surface, but ultimately could have reached the outfall 004 natural drainage ditch.
- 3. If it was soil, were any samples analyzed? The samples taken no. 4-9 (shown at atch 2) were of the sediment in the stormwater metal culvert where the PVC pipe connected, directly at the outfall 004 natural drainage ditch where the metal culvert ends, and then about 3 feet downstream of the outfall 004.

I hope this helps, and if you any questions or need any additional information, please contact me at (414) 482-6151. Thanks for your time.

Monica

Monica Lewis Chief, Environmental Flight 440th Airlift Wing, General Mitchell Field DSN 741-6151 COM (414) 482-6151

----Original Message-----

From: Eckstein Royal W Civ 440 SPTG/PB Sent: Friday, September 27, 2002 3:21 PM

To: Williams, Michelle L

Cc: Lewis Monica Civ 440 SPTG/CEV; Cavil Thomas J Civ 440 MSS/SGP

Subject: RE: samples taken at Engine Test stand 7/26/02

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Hope this helps.

Royal Eckstein 440 Bioenvironmental Engineering Services GMIAP-ARS (414) 482-5240

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Subject: samples taken at Engine Test stand 7/26/02

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Thanks very much,

Michelle Williams
WDNR Hydrogeologist
phone:(414) 263-8564
fax: (414) 263-8483
NEW E-MAIL ADDRESS AS OF 6/16/02:
MICHELLE.WILLIAMS@DNR.STATE.WI.US