



March 20, 2020

The Wisconsin Department of Natural Resources
Remediation and Redevelopment Program
Attn: Maizie Reif
2984 Shawano Ave
Green Bay, WI 54313-6727

RE: **No Further Action Report**
Oshkosh Corporation South Plant Diesel Spill
2850 Hughes Street
City of Oshkosh, Winnebago County, Wisconsin
WDNR Spill ID: 20200309NE71-1

Dear Ms. Reif:

Please find attached the No Further Action (NFA) Report for the Oshkosh Corporation South Plant diesel spill located at 2850 Hughes Street, in the City of Oshkosh, Winnebago County, Wisconsin.

Valley Environmental Response appreciates the opportunity to provide report this report to you. Please feel free to contact me with any questions.

Sincerely,

Chuck Anderson

Chuck Anderson
Valley Environmental Response

CC: Stephanie Peffer – speffer@defense.oshkoshcorp.com
Sue Murawski - smurawski@defense.oshkoshcorp.com



NO FURTHER ACTION REPORT

OSHKOSH CORPORTION SOUTH PLANT DIESEL SPILL

**2850 Hughes Street
City of Oshkosh
Winnebago County, Wisconsin**

Prepared For: The Wisconsin Department of Natural Resources
Remediation and Redevelopment Program
Attn: Maizie Reif
2984 Shawano Ave
Green Bay, WI 54313-6727

Prepared By: Valley Environmental Response
2850 Jackson Street
Oshkosh, WI 54901

Report Date: March 20, 2020

WDNR Spill ID: 20200309NE71-1

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1.0 INTRODUCTION

On Monday, March 9, 2020, Valley Environmental Response (VER) responded to and cleaned up impacts resulting from a diesel spill on a gravel parking lot caused as the result of an Oshkosh Corporation truck being towed by Nolte's Towing catching and tearing open a saddle tank on another parked truck owned by Oshkosh Corporation during a rainstorm.

The spill was located on the southwest portion of the Oshkosh property located at 2850 Hughes Street, in the City of Oshkosh, in Winnebago County, Wisconsin. More specifically, the spill occurred in the southwest $\frac{1}{4}$ of the southeast $\frac{1}{4}$ of Section 35, Township 18 North, Range 16 East at Wisconsin Transverse Mercator (WTM) Coordinates: 636350, 391024. See the attached Figure 1 - Site Location Map and Figure 2 – Spill Location Map.

VER dispatched to the site Monday, March 9, 2020 to evaluate the spill, applied absorbent pad and oil dry to the spill area; surrounded the spill area with petroleum absorbent boom and oil dry to fully contain it; placed additional boom at downgradient storm drains as a precaution to prevent any runoff from entering the drains; and determined the resources that would be necessary to properly respond to the remaining release. Additionally, the spill area was coned and taped off from the time the spill occurred until the response actions were conducted.

On Friday, March 13th, 2020, VER mobilized support staff and equipment, to complete the spill response actions.

This report is written to summarize the response action and fulfill the reporting requirements as specified under the Wisconsin Administrative Code (WAC) NR 708.09.

1.1 Nature and Duration of Discharge

The diesel spill was caused as the result of an Oshkosh Corporation truck being towed by Nolte's Towing catching and tearing open a saddle tank on another parked truck owned by Oshkosh Corporation during a rainstorm. It was estimated that approximately 25 gallons of diesel fuel spilled onto the gravel parking lot.

VER arrived on site on Monday, March 9, 2020. Initial assessment of the spill identified that the diesel fuel was soaking in and running over the gravel parking lot. VER applied oil dry, absorbent pad and boom around the spill area. The spill was contained at the time of the initial assessment.

Cleanup efforts are described in detail in Section 2.0.

1.2 Prior Mitigation Efforts

Prior to VER's arrival, Oshkosh Corporation and Nolte's towing staff used what absorbents were available to contain the spill until VER arrived on site..

1.3 Weather Conditions

Weather conditions over the duration of the discharge and subsequent response action to excavate the diesel impacted soil varied from partly cloudy to rain, with temperatures between 25 and 50 degrees Fahrenheit. Wind was light and variable. Work was conducted during favorable weather with absorbents and boom confirmed to be in place and working effectively following significant rain events and prior to soil disposal.

1.4 Migration Potential of Release

The following general site conditions were noted relative to potential migration issues that needed to be considered:

- Surface Conditions – The surface of the area within the vicinity of the spill consisted of a very large gravel parking lot.
- Subsurface Soil Conditions – The gravel in the parking lot extended to approximately 6 inches below ground surface and was underlain by native red brown silty clay to the depth excavated.
- Surface Water Bodies – No surface water was impacted as the result of this spill. The nearest surface water body is an unnamed intermittent stream located approximately 585 feet northwest of the spill area.
- Drains or Storm Sewers – A down gradient storm sewer was identified north of the spill site. The storm sewer manway was protected with petroleum absorbent boom at the time of the initial spill response. At no time was diesel fuel observed to leave the boom and granular absorbent containment placed around the initial spill location, and therefore it does not appear sewers were impacted as the result of this spill.
- Depth to Groundwater – Depth to groundwater beneath the site is not known, however, the spill was surficial, no groundwater was encountered during cleanup activities performed at the site, and therefore potential groundwater impacts are not believed to be a concern.
- Integrity of Containment Area – Diesel fuel soaked into the gravel and migrated to the north across the gravel parking lot and into the gravel and silty clay soils beneath. Absorbent pad, boom and oil dry applied on and around the spill area at the time of the initial response appeared sufficient as no diesel fuel was observed to have migrated beyond the absorbents.

2.0 RESPONSE ACTION DOCUMENTATION

This section documents the response action performed by VER.

2.1 Initial Site Conditions

As noted in Section 1.1, VER arrived on site March 9, 2020 to assess the existing site conditions. Upon arrival, additional absorbent pad, boom and oil dry was applied to the spill area and absorbent boom secured at a downgradient storm sewer manway to protect the sewer should diesel migrate outside the containment boom during future forecasted rain events.

The spill area was monitored with no indication of the fuel migrating beyond the initially secured spill containment.

Following initial assessment and discussions with the Wisconsin Department of Natural Resources (WDNR), VER mobilized support staff and equipment to the site March 13, 2020 to complete the response actions.

2.2 Response Action Summary

Under direction of the WDNR, VER mobilized the necessary equipment, materials and personnel to properly mitigate the release. The following response actions were taken:

- Spill Containment Efforts – Oil dry, absorbent pad and boom was initially placed over and around the spill area to stabilize the spill until impacted soils could be excavated.
- Surface Cleaning Efforts – Impacted gravel and soil was excavated in response to the spill. The area was then backfilled with clean gravel and therefore no additional surface cleaning was necessary.
- Impacted Soil Excavation – On March 13, 2020, as directed by the acting WDNR Northeast Region Spills Coordinator, Maizie Reif, diesel impacted soil was excavated until there was no remaining evidence of the presence of diesel fuel, as determined by using visual and olfactory evidence, in addition to field screening soils utilizing a photoionization detector (PID).

Excavation limits extended approximately 30 feet by 70 feet with depths ranging from approximately 2 to 4 inches in the southern portion of the spill area to approximately 10 inches below ground surface in the north central portion of the spill area where the diesel fuel had pooled at the time of the spill.

In total, approximately 30 tons of diesel impacted granular absorbent, gravel and soil was excavated and disposed of at Waste Management's Valley Trail Landfill. Figure 3 – Excavation Limits identifies the excavation extent, location, depth and field screening results for the soil analyzed during the excavation. Further discussion of waste disposal is provided in Section 2.4 of this report.

- Water Management – Not applicable. No water was encountered as part of the spill response action.
- Restoration – On March 13, 2020, following impacted gravel and soil excavation, gravel was utilized to backfill the parking lot area of the excavation.

Photo documentation of the spill, response actions and restoration can be found in Appendix A.

2.3 Verification Sampling Summary

Based upon the cleanup objectives utilized by VER on similar cleanups of this type, prompt response minimizes infiltration of contaminants into the subsurface. Therefore, prompt application of absorbents followed by excavation of impacted soil was completed.

Granular absorbent, absorbent pad and boom was placed on and around the area impacted by diesel fuel the day of the incident. No significant migration of fuel or sheen was observed during subsequent site visits. The remaining absorbents were removed from the site on Friday, March 13, 2020 at the time of the excavation.

Based on the above, field screen results (utilizing a PID) and the lack of all visual and olfactory evidence of migration of diesel fuel beyond the limits of the excavation, the area impacted by the spill has been cleaned up and meets the cleanup criteria required by WDNR under WAC NR 708.09.

2.4 Waste Disposal

The following wastes were properly handled and disposed of as a result of this response effort:

- Diesel Impacted Gravel/Soil/Granular Absorbent – A total of approximately 30 tons of diesel impacted gravel, soil and absorbent was disposed of at Waste Management's Valley Trail Landfill located in Berlin, Wisconsin. Copies of the disposal documentation are provided in Appendix B.
- Diesel Impacted Boom and Pad – A total of one cubic yard box of diesel impacted boom and pad was disposed of at Covanta Environmental Services located in Winneconne, Wisconsin. Copies of the disposal documentation are provided in Appendix B.
- Diesel Fuel – A partial drum of diesel fuel recovered from the damaged saddle tank that was leaking was disposed of at OSI Environmental located in Kaukauna, Wisconsin. Copies of the disposal documentation are provided in Appendix B.

3.0 ASSESSMENT OF RESPONSE ACTION EFFECTIVENESS

This section provides an assessment of the spill response action effectiveness relative to the items specified in NR 708.09 (i) through (m).

3.1 Response Effectiveness Evaluation

The following effectiveness evaluation is provided:

- Visual and Olfactory Evidence – There is no remaining visual or olfactory evidence of impacts associated with the release.
- Actual or Potential Environmental Impacts – All cleanup criteria have been met as part of the response action required by WDNR. Therefore, there are no apparent remaining actual or potential environmental impacts associated with the spill that resulted from the torn fuel tank.
- Proximity of Contamination to Receptors
 - Human Direct Contact – All cleanup criteria were met and it appears that no residual impacted gravel/soil remains in the location of the spill.
 - Surface Water – As noted in Section 1.4, the nearest surface water body, an unnamed intermittent creek is located approximately 580 feet northwest of the spill site and therefore, there is no potential surface water to be a receptor.
 - Groundwater – As noted in Section 1.4, no groundwater was encountered during the response action and the spill impacts were surficial in nature.
 - Soil – Soil impacted as a result of the spill have been excavated and properly disposed at a licensed landfill.
- Exposure Route Assessment
 - Human Direct Contact – All cleanup criteria were met. No residual diesel fuel is present.
 - Vapor Intrusion – Not applicable. The spilled material was excavated and disposed of at a licensed landfill and therefore, cleanup criteria have been met.
 - Surface Water/Sediment – Not applicable. See discussion in Section 1.4.
 - Groundwater - Not applicable. See discussion in Section 1.4.

3.2 Conclusion

Based on the data and evaluations presented above, the response action met all established cleanup criteria as required under WAC NR708.09. It appears that the environment has been restored to the extent practicable. Based on the above, no further action appears to be required associated with this spill at this time.

FIGURES



Figure 1 - Site Location Map



Legend

1.5 0 0.75 1.5 Miles

NAD_1983_HARN_Wisconsin_TM

1:47,520



DISCLAIMER: The information shown on these maps has been obtained from various sources and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notes web page: <http://dnr.wi.gov/org/legal/>

Note: Not all sites are mapped.

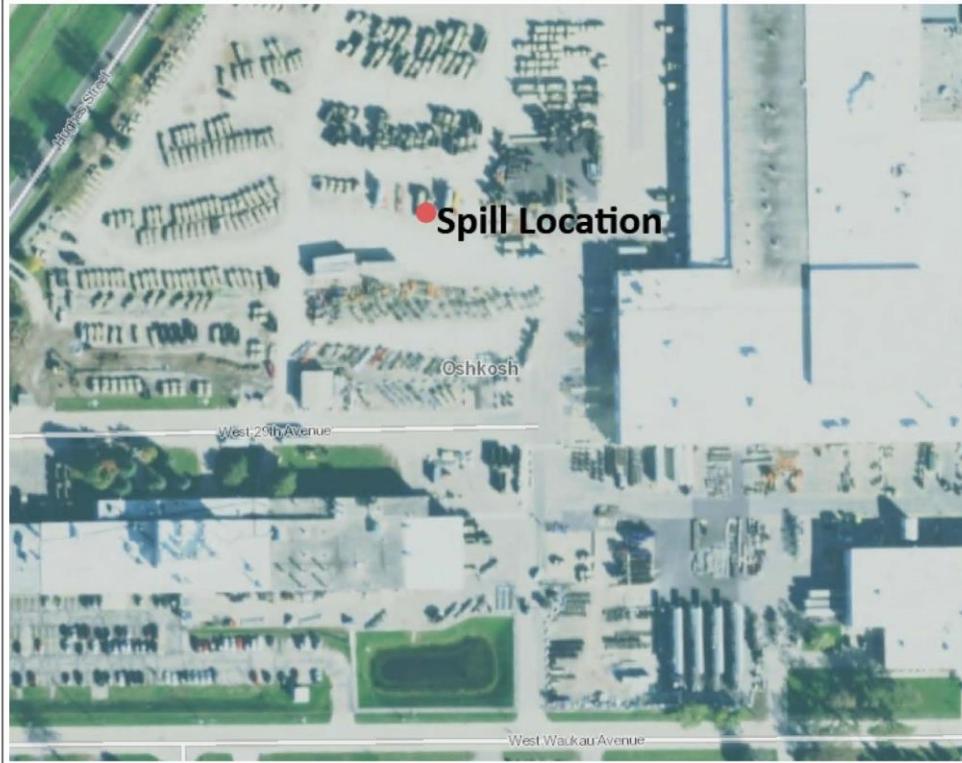
Notes

Red Dot: Spill Location

WTM: 636350, 391024



Figure 2 - Spill Location Map



Legend

0.1 0 0.03 0.1 Miles

NAD_1983_HARN_Wisconsin_TM

1:1,980



DISCLAIMER: The information shown on these maps has been obtained from various sources and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notes web page: <http://dnr.wi.gov/legal/>

Note: Not all sites are mapped.

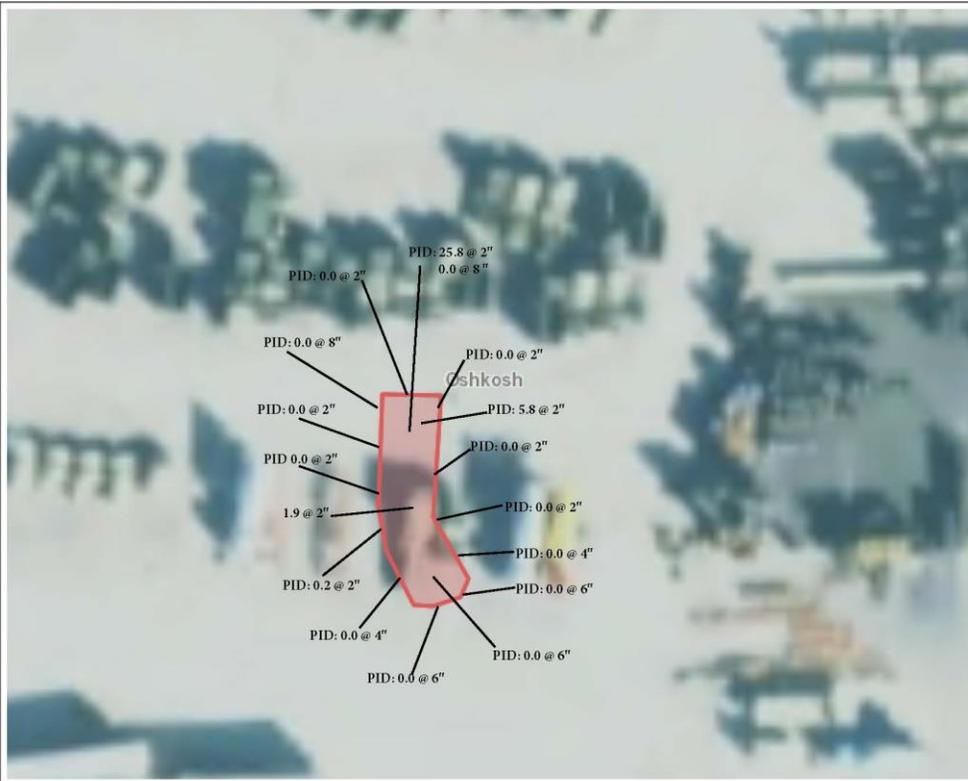
Notes

Red Dot: Spill Location

WTM: 636350, 391024



Figure 3 - Excavation Limits Map



Legend

0.0 0 0.01 0.0 Miles

NAD_1983_HARN_Wisconsin_TM

1:495



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Note: Not all sites are mapped.

Notes

Red Polygon: Approximate Excavation Limits

WTM: 636350, 391024

APPENDIX A
Photo Documentation

Photos of Initial Response



View of leaking saddle tank.



Absorbents being placed over spill.



Photos of March 13, 2020 VER Response Action



View of spill location prior to excavation, looking south southwest



View of spill area prior to excavation, looking west





North end of excavation (water is the result of the weeks rain events), view looking east



Scrape/excavation, view looking northwest



South end of scrape/excavation, view looking east



Spill area following backfill/compaction, view looking northeast





Spill area following backfill/compaction, view looking southeast

APPENDIX B
Waste Disposal Documentation

STRAIGHT BILL OF LADING - SHORT FORM

Carrier Name: Valley Environmental Response Phone 1-800-745-1865 EXT 2
 Carrier Address: 2850 Jackson St Date 3-17-20
 City Oshkosh SHIPMENT IDENTIFICATION NO.
 State and Zip: Wisconsin 54902 SAC DUNS FREIGHT BILL PRO NO.

TO: COUNTY ENVIRONMENTAL SOLUTIONS TRAILER/CAR NUMBER
 Consignee
 Address 210 TOWER RD
 City WINNEBAGO
 State and Zip WI 54986 ROUTE

FROM: OSHKOSH DEFENSE / NOTES TO SHIPPER SPECIAL INSTRUCTIONS
 Shipper
 Address 2850 HUGHES ST
 City OSHKOSH
 State and zip WI 54902

FOR PAYMENT SEND BILL TO: SHIPPER'S INTERNAL DATA
 Name
 Address
 City
 State & Zip
 SID NO.

Number Shipping Units	*HQ	Kinds of Packaging, Description of Articles, Special Marks and Exceptions	Code	Weight Subject to Correction	Rate	Charges
1		NON HAZ, NON BULK, NON DOT DIESEL IMPACTED ROOM / PAD	TOTE			

REMIT C.O.D. TO Address City State & zip
 NOTE - Where the rate is dependant on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ per
 COD AMT: \$
 Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
 The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
 Signature of Consignor
 C.O.D. FEE PREPAID \$ COLLECT \$
 TOTAL CHARGES \$
 FREIGHT CHARGES ARE PREPAID UNLESS MARKED COLLECT
 CHECK BOX IF COLLECT

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to its destination. It is mutually agreed as to each carrier of all or any of the said property, over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER OSHKOSH DEFENSE / NOTES CARRIER
 PER [Signature] PER [Signature: Scott Gross]

* Mark "X" or "RD" if appropriate to designate Hazardous Materials as defined in the Department of Transport Regulations governing the transportation of hazardous materials. The use of this column is an optional method for identifying hazardous materials on bills of lading per Section 172.201(a)(1)(iii) of Title 49, Code of Federal Regulations. Also, when shipping hazardous materials the shipper's certification statement prescribed in Section 172.204(a) of the Federal Regulations must be indicated on the bill of lading, unless a specific exemption from this requirement is provided in the Regulations for a particular material.

STRAIGHT BILL OF LADING - SHORT FORM

Carrier Name: Valley Environmental Response Phone 1-800-745-1865 EXT 2
 Carrier Address: 2850 Jackson St Date 3-17-20
 City Oshkosh SHIPMENT IDENTIFICATION NO. VER 031720
 State and Zip: Wisconsin 54902 SAC DUNS FREIGHT BILL PRO NO.

TO: OSI Environmental INC TRAILER/CAR NUMBER
 Consignee Address 2253 PROGRESS WAY
 City KAUKAUNA ROUTE
 State and Zip WI 54130

FROM: OSHKOSH DEFENSE / NOTES TOWN
 Shipper Address 2850 HUGHES ST
 City OSHKOSH SPECIAL INSTRUCTIONS
 State and zip WI 54902

FOR PAYMENT SEND BILL TO:
 Name SHIPPER'S INTERNAL DATA
 Address
 City
 State & Zip SID NO.

Number Shipping Units	*HQ	Kinds of Packaging, Description of Articles, Special Marks and Exceptions	Code	Weight Subject to Correction	Rate	Charges
1		NON HAZ, NON RCRA, NON DOT DIESEL FUEL	DRUM			

REMIT C.O.D. TO Address City State & zip
COD AMT: \$
Subject to Section 7 of conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
 Signature of Consignor
 C.O.D. FEE PREPAID \$ COLLECT \$
 TOTAL CHARGES \$
 FREIGHT CHARGES ARE PREPAID UNLESS MARKED COLLECT
 CHECK BOX IF COLLECT

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked consigned and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to its destination. It is mutually agreed as to each carrier of all or any of the said property, over all or any portion of said route to said destination, on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER OSHKOSH DEFENSE / NOTES TOWN CARRIER JTB
 PER VER [Signature] PER OSI Env. 3-17-20

* Mark "X" or "RC" if appropriate to designate Hazardous Materials as defined in the Department of Transport Regulations governing the transportation of hazardous materials. The use of this column is an optional method for identifying hazardous materials on bills of lading per Section 172.201(a)(1)(ii) of Title 49, Code of Federal Regulations. Also, when shipping hazardous materials the shipper's certification statement prescribed in Section 172.204(a) of the Federal Regulations must be indicated on the bill of lading, unless a specific exemption from this requirement is provided in the Regulations for a particular material.

Valley Trail Landfill
 N9101 Willard Road
 Berlin, WI, 54923
 Ph: 920-361-4995

Reprint
 Ticket# 1191749

Customer Name VALLEYENVIRO VALLEY ENVIRONME Carrier Valley Environmental
 Ticket Date 03/13/2020 Vehicle# 19 Volume
 Payment Type Credit Account Container
 Manual Ticket# Driver
 Hauling Ticket# Check#
 Route Billing # 0001252
 State Waste Code BR-23 Gen EPA ID
 Manifest 200
 Destination Grid
 PO
 Profile BIO133125WI (DIESEL IMPACTED GRANULAR ABSORB SOIL GRAVEL WM012B)
 Generator 136-OSHKOSHCORP2850 OSHKOSH CORPORATION

	Time	Scale	Operator	Inbound	Gross	53700 lb*
In	03/13/2020 11:21:32	scale	cnissen		Tare	32320 lb
Out	03/13/2020 11:39:12	scale	cnissen		Net	21380 lb
			* Manual Weight		Tons	10.69

Comments brought paper work to office

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 Spw Biorem RGC-Ton	100	10.69	Tons				
2 ENVT-ENVIRONMENTAL	100	10.69	Tons				
3 FUELT-FUEL SURCHAR	100	10.69	Tons				

Total Tax
 Total Ticket

Driver`s Signature

Valley Trail Landfill
 N9101 Willard Road
 Berlin, WI, 54923
 Ph: 920-361-4995

Reprint
 Ticket# 1191750

Customer Name VALLEYENVIRO VALLEY ENVIRONME Carrier B E S T
 Ticket Date 03/13/2020 Vehicle# 34 Volume
 Payment Type Credit Account Container
 Manual Ticket# Driver
 Hauling Ticket# Check#
 Route Billing # 0001252
 State Waste Code BR-23 Gen EPA ID
 Manifest 201
 Destination Grid
 PO
 Profile BIO133125WI (DIESEL IMPACTED GRANULAR ABSORB SOIL GRAVEL WM012B)
 Generator 136-OSHKOSHCORP2850 OSHKOSH CORPORATION

	Time	Scale	Operator	Inbound	Gross	69560 lb
In	03/13/2020 11:22:45	scale	cnissen		Tare	30040 lb
Out	03/13/2020 11:41:26	scale	cnissen		Net	39520 lb
					Tons	19.76

Comments

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 Spw Biorem RGC-Ton	100	19.76	Tons				
2 ENVT-ENVIRONMENTAL	100	19.76	Tons				
3 FUELT-FUEL SURCHAR	100	19.76	Tons				

Total Tax
 Total Ticket

Driver`s Signature