



May 17, 2018

Mr. Daniel Gonnering  
Volk Field CRTC/CEVP  
Bldg. 331  
100 Independence Drive  
Camp Douglas WI 54618

Subject: Reported Contamination at Volk Field, Camp Douglas, WI  
DNR FID #729055690

Dear Mr. Gonnering:

The Department of Natural Resources (DNR) was notified on the dates shown below, and by the parties indicated, on behalf of Volk Field, that polyfluorinated alkyl substances (PFAS) contamination has been detected at Volk Field in the following areas:

Site Name	DNR Notified By:	Notification Date	DNR BRRTS #
VOLK FIELD AREA 1 FMR FTA	Aerostar SES LLC	11/21/2017	02-29-580641
VOLK FIELD AREA 2 PRIMARY SPRAY TEST AREA	Aerostar SES LLC	11/21/2017	02-29-580642
VOLK FIELD AREA 4 FMR PRIMARY SETTLING POND	Dan Gonnering, VF Environmental	5/10/2018	02-29-581455
VOLK FIELD AREA 5 KC-97 CRASH SITE	Aerostar SES LLC	11/21/2017	02-29-580643
VOLK FIELD AREA 6 2ND SETTLING PONDS	Aerostar SES LLC	11/21/2017	02-29-580644

Based on the information that has been submitted to the DNR regarding this site, we believe you are responsible for investigating and restoring the environment at the above-described sites under Section 292.11, Wisconsin Statutes, known as the hazardous substances spill law.

This letter describes the legal responsibilities of a person who is responsible under section 292.11, Wis. Stats., explains what you need to do to investigate and clean up the contamination, and provides you with information about cleanups, environmental consultants, and working cooperatively with the DNR.

**Legal Responsibilities:**

Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Statutes, states:

- **RESPONSIBILITY.** 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 the state.

Wisconsin Administrative Code chapters NR 700 through NR 754 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

U.S.EPA maximum contaminant levels (MCLs) and Wisconsin Administrative Code § NR 140 groundwater quality standards have not been established for PFAS compounds; however, the U.S. EPA currently has a cumulative Health Advisory Level (HAL) of 70 parts per trillion (ppt) for two of the most prevalent PFAS detected in drinking water. Persons responsible for the discharge of PFAS to the environment will need to determine appropriate standards for remedial action per Wis. Admin. Code ch. 722. DNR has authority to require that the responsible party develop a site-specific cleanup standard for contaminated environmental media in accordance with Wis. Admin. Code § NR 722.09.

### **Steps to Take:**

Consistent with a 1992 Department of Defense and State Memorandum of Agreement (DSMOA), the DNR acknowledges that in the event annually authorized and appropriated funds are inadequate for the cleanup of hazardous or toxic contaminants under the DSMOA agreement in any year, priorities among sites may need to be established in a manner which maximizes the protection of human health and the environment.

However, the longer contamination is left in the environment, the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. The following information provides the required steps to take. Unless otherwise approved by DNR in writing you must complete the work by the timeframes specified.

1. As soon as practicable, you should submit written verification (such as a letter from the consultant) that you have hired an environmental consultant. If you do not take action, the DNR may initiate enforcement action against you.
2. Wis. Admin. Code NR 700.11(1)(bm) requires that you must submit a work plan for completing investigations at each of the sites listed above. The work plan must comply with the requirements in the NR 700 Wis. Adm. Code rule series and should adhere to current DNR technical guidance documents.
3. You must initiate the site investigation within 90 days of submitting the site investigation work plan. You may proceed with the field investigation upon DNR notification to proceed. If the DNR has not responded within 30 days from submittal of the work plan, you are required to proceed with the field investigation. If a fee for DNR review has been submitted, the field investigation must begin within 60 days after receiving DNR approval.
4. Within 60 days after completion of the field investigation and receipt of the laboratory data, you must submit a Site Investigation Report to the DNR or other agency with administrative authority.
5. Within 60 days after submitting the Site Investigation Report, you must submit a remedial action options report (RAOR). The RAOR shall include an evaluation of Green and Sustainable Remediation opportunities as required by s. NR 722.09 (2m), Wis. Adm. Code.

Sites where discharges to the environment have been reported are entered into the Bureau for Remediation and Redevelopment Tracking System ("BRRTS"), a version of which appears on the DNR's internet site. You may

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view the information related to your site at any time (<http://dnr.wi.gov/botw/SetUpBasicSearchForm.do>) and use the feedback system to alert us to any errors in the data.

If responsible parties want a formal written response from the department on a specific submittal, please be aware that a review fee is required in accordance with ch. NR 749, Wis. Adm. Code. However, DNR acknowledges that reimbursement for review time spent on Volk Field submittals is made through the DSMOA agreement. Please be aware that the timeframes specified above are required by rule, and you must complete the site investigation and cleanup to maintain your compliance with the spills law and chapters NR 700 through NR754. Your consultant is expected to know our technical procedures and administrative rules and should be able to answer your questions on meeting cleanup requirements.

All correspondence regarding this site should be sent to:

Mae Willkom  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources  
1300 West Clairemont Avenue  
Eau Claire, WI 54701  
[mae.willkom@wisconsin.gov](mailto:mae.willkom@wisconsin.gov)

Unless otherwise directed, submit one paper copy and one electronic copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

**Additional Information for Site Owners:**

We encourage you to visit our website at <http://dnr.wi.gov/topic/Brownfields/>, where you can find information on selecting a consultant, financial assistance and understanding the cleanup process. You will also find information there about liability clarification letters, post-cleanup liability and more.

If you have questions, call me at 715-839-3748 for more information or visit the RR web site at the address above.

Thank you for your cooperation.

Sincerely,



Mae Willkom  
Hydrogeologist  
Remediation & Redevelopment Program

Cc: Keith Freihofer, NGB/A4OR Environmental Restoration Program Manager, Air National Guard Readiness Center/National Guard Bureau, 3501 Fetchet Ave - Shepperd Hall, Joint Base Andrews MD 20762-5157