04-71-554631

SPILL ID# 20090427NE71-1 BRRTS# 04-71-554631

State of Wisconsin - Department of Natural Resources
Substance Release Notification Report (SERTS)
Report created on 01/04/2010

Incident Date & Time:	Reported Date & Time:	BRRTS No:	Spill ID:
04/23/2009	04/27/2009 1615	04-71-554631	**20090427NE71-1**
DATCP Reported? No **DATCP Transferred? No**	**NFA Letter Sent?** No	**ERP Transferred?** No	**Incident Closed?** Yes : 12/22/2009

Location

Region:	County:	Municipality:
NE	Winnebago	OSHKOSH, CITY OF

Facility/Property Name and Street Address:
OSHKOSH TRUCK DEFENSE PLT
2737 HARRISON ST

Description:
DEFENSE PLANT ABOVE GROUND DIESEL TANK
visible on DOP

Facility Type: Industrial Facility (Foundry/Factory/Plating/Manufacturing)

Lat/Long:

PLSS:
NW ¼ of NE ¼ of Sec 12, T18N, R16E

WTM:
637500 398784

Weather Conditions:
add to SDE - MGS - 6/14/2011

Responsible Parties

Name/Address (1):	Contact:	Other Contact:	Spill Packet:
OSHKOSH CORP 2737 HARRISON ST OSHKOSH, WI 54901- (920) 233-9592 x Primary	DON DRAXLER ENVIRONMENTAL DIRECTOR (920) 233-9592 x primary	SUE MURAWSKI ENVIRONMENTAL ENGINEER (920) 233-9582 x primary	

Cause

OVERFLOW OF A 6000 GALLON ABOVE GROUND DIESEL FUEL STORAGE TANK, LEVEL ALARMS DID NOT WORK, CAUSING THE OVERFLOW ONTO THE PAVEMENT AND INTO THE GRAVEL AND MADE ITS WAY INTO THE BUILDING AND INTO THE CITY SANITARY SEWER

Cause Type: Overfill (storage tank, verhicle or equipment)

Substances

Name	Other / Comments	Amt Released	Amt Recovered	Type	Color	Odor
Diesel		UNK	UNK	LIQUID		

Environmental Impacts / Damages

Environmental Impacts:	Resource Damages:	Injuries:	Evacuation:
CONCRETE SANITARY SEWER SOIL	No	No	No

Cleanup Actions

Method	Description
Shut-down System	
Other	CUT OFF AND PLUGGED OLD SEWER PIPE
Excavation	EXCAVATED THE CONTAMINATED GRAVEL
Repairs Made	NEW TANK ALARMS INSTALLED

Cleanup Action Comments

UNKNOW AMOUNT OF DIESEL OVERFLOWED THE TANK AND MIGRATED INTO THE GRAVEL AND FOLLOWED AN OLD PIPE INTO THE BUILDING TO A FLOOR DRAIN THAT DISCHARGED INTO THE SANITARY SEWER. OSHKOSH CORP INVESTIGATED THE EXTENT OF THE CONTAMINATION. THE GRAVEL TRENCH TO THE BULDING WAS CONTAMINATED WITH DIESEL. THE CONTAMINATED GRAVEL WAS EXCAVATED AND TAKEN TO GLACIER RIDGE LANDFILL. THE OLD PIPE WAS REMOVED AND THE HOLE IN THE FOUNDATION WAS SEALED. THE TANK ALARMS WERE REPAIRED AND A THIRD ALARM WAS INSTALLED.

Contractors Hired

Name	Description

State of Wisconsin - Department of Natural Resources
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Waste Destinations

Location	Description
VEOLIA GLACIER RIDGE LANDFILL HORICON WI	8.75 TONS OF DIESEL CONTAMINATED GRAVEL/SOIL

Agencies Notified / On Scene

Agency	Notified	On Scene
DNR	X	X
PUBLIC WORKS	X	X

Additional Comments

DISCOVERED THE TANK OVERFLOW ON THURSDAY 4-23-09, THOUGHT TO HAVE BEEN A SMALL SPILL ONTO THE PAVEMENT, SO THEY DIDN'T REPORT THEN. REPORTED ON MONDAY WHEN THERE WAS STILL DIESEL IN THE SANITARY SEWER, AND ASSUME A LOT MORE DIESEL SPILLED THAN FIRST THOUGHT. OSHKOSH CORP IS INVESTIGATING THE RELEASE. DON DRAXLER WILL KEEP MOELLER UPDATED ON STATUS OF INVESTIGATION\CLEAN UP. 05-06-09, MOELLER SPOKE WITH DON AND SUE, THE DIESEL FOUND ITS WAY TO THE BUILDING AND INTO THE SEWER BY WAY OF THE GRAVEL TRENCH FROM THE TANK TO THE BUILDING. THE DIESEL FOLLOWED THE OLD PIPE IN THE TRENCH INTO THE BUILDING AND DRAINED INTO THE SANITARY SEWER. THE CONTAMINATED GRAVEL WAS EXCAVATED AND THE OLD SEWER PIPE WAS CUT OFF AND CAPPED WITH CONCRETE. 05-13-09, JIM SAVINSKI - DNR - VISITED THE SITE AND CONFIRMED THAT THE SPILL WAS PROPERLY CLEANED UP. 12-18-09, DNR RECEIVED A CLEAN UP REPORT FROM SUE MURAWSKI - OSHKOSH CORP.

Enforcement Action/Citation

Enforcement Action/Citation? No

Case Activity Reports:	

Person Reporting

Name	Representing / Address	Primary Phone	Secondary Phone
DON DRAXLER	OSHKOSH CORP	(920) 233-9592 x	

Contractors Hired

Name / Address	Zone Contractor Hired by DNR?
	No

Contacts

Role	Name	Office Phone	Date	Time
Prepared By:	JASON MOELLER	(920) 662-5492 x	04/27/2009	
Person Notified:	JIM SAVINSKI	(920) 424-4013 x	04/27/2009	
Investigated By:	JIM SAVINSKI	(920) 424-4013 x	05/13/2009	
Incident Commander:				
Spill Coordinator:	JASON MOELLER, NE Region Jason Moeller	(920) 662-5492 x	12/22/2009	

Electronic Attachments (list)

Name	Type

OSHKOSH CORPORATION

ISO 9001CERTIFIED

2307 OREGON STREET
POST OFFICE BOX 2566
OSHKOSH WISCONSIN 54903-2566
920-235-9151

WI DNR
RECEIVED
DEC 18 2009
NER WASTE/RR

OSHKOSH

Direct Dial: 920-233-9592

Certified Mail, Return Receipt requested

December 17, 2009

Jason Moeller
Wisconsin Department of Natural Resources
Northeast Regional Office
2984 Shawano Avenue, P.O. Box 10448
Green Bay, WI 54307-0448

Subject: Diesel Fuel Release of April 27, 2009
Oshkosh Corporation
Defense Plant, 2737 Harrison Street, Oshkosh, Wisconsin 54902

Dear Jason:

As a follow-up to our telephone conversation of last week, attached is the write up for the diesel fuel release in April 2009 at Oshkosh Corporation's Defense Plant located at 2737 Harrison Street in Oshkosh, Wisconsin. As you are aware, the release occurred when our new 6,000-gallon double-walled aboveground storage tank was overfilled.

The release was caused by an unfortunate series of events including an alarm malfunction. The new AST system now has 3 alarm systems with concrete secondary containment for more than double the 6,000-gallon double-walled tank volume. As noted in the attached write up, several steps have been taken to prevent a similar incident from occurring again. We trust that the information provided will assist you in closing out this spill case. If you have any questions, please contact me at (920) 233-9582 or Don Draxler at (920) 233-9592. Thank you.

Sincerely,

Suzanne Murawski
Sr. Environmental Engineer

Encl.

cc: Don Draxler, Oshkosh Corporation

Moeller, Jason W - DNR

From: Savinski, James L - DNR
Sent: Thursday, June 11, 2009 8:34 AM
To: Moeller, Jason W - DNR
Subject: FW: Oshkosh Corporation Harrison Street

Attachments: Fuel Summary.pdf

Fuel Summary.pdf
(6 KB)

Hi Jason,

I apologize for my delay in getting this to you.

I am satisfied this spill was properly cleaned up and that Oshkosh Corp. has taken all the necessary steps to prevent a recurrence. Let me know if you have questions or need additional information from me.

Jim Savinski

From: smurawski@oshkoshcorp.com [smurawski@oshkoshcorp.com]
Sent: Thursday, May 14, 2009 4:29 PM
To: Savinski, James L - DNR
Cc: DDraxler@oshkoshcorp.com
Subject: Oshkosh Corporation Harrison Street

Jim -

Thank you for taking the time to visit our Defense facility yesterday and being able to meet in person. As a follow up to our conversation, attached is a spreadsheet showing the volume of fuel removed from the AST this year.

As discussed, the release occurred after a series of unexpected and unfortunate events. After going above and beyond the regulations and spending $10,000's by removing the existing ASTs and replacing them with the current new AST system, no party is more disappointed in the release than we are. To prevent the possibility of this ever occurring again, we have:

1. Installed a device on the AST to send an electronic message to the vendor and internal personnel when the AST is 70% full, 2. Instituted additional controls and procedures on steps to take should the 80% full alarm sound inside our facility, 3. Repaired the 90% full deactivation system/alarm associated with the feed pump, 4. Instituted a requirement for the vendor to remove fuel from the AST at least once every 14 days and to leave a maximum of 500 gallons in the AST.
This requirement will be monitored and the frequency shortened if deemed necessary.
5. While not required with a double-wallled AST, we have taken steps to make the concrete structure around the new AST liquid tight.

We are also looking at installing a redundant alarm(s) at the feed pump location. As discussed yesterday with Don, we believe these measures will prevent any possibility of a release from this AST from reoccurring, but if you have any additional recommendations please let us know. Again, thank you for your time yesterday and for your understanding on this matter.

Respectfully,

Sue Murawski, P.E.

Sr. Environmental Engineer

Oshkosh Corporation
920-233-9582
cell 920-410-6851
fax 920-233-9263
smurawski@oshkoshcorp.com

(See attached file: Fuel Summary.pdf)

Although this e-mail and any attachments are believed to be free of any virus or other defect which might affect any computer system, it is the responsibility of the recipient to check that it is virus-free and the sender accepts no responsibility or liability for any loss, injury, damage, cost or expense arising in any way from receipt or use thereof by the recipient.

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Thank you.

Date Pumped	Amount Removed by Vendor (gallons)
29-Jan-09	4,628.1
17-Feb-09	4,589.0
5-Mar-09	500.0
6-Mar-09	4,144.0
1-Apr-09	4,583.5
23-Apr-09	4,602.8
30-Apr-09	3,799.1
7-May-09	2,544.2

6,000 gallon tank
80% full = 4,800 gallons
90% full = 5,400 gallons

Diesel Fuel Release of April 27, 2009
Defense Plant
2737 Harrison Street
Oshkosh, Wisconsin 54902

Event

A release of diesel fuel from Oshkosh Corporation's Defense Plant was reported to the Wisconsin Department of Natural Resources via Jason Moeller (920-662-5492) on April 27, 2009. The release occurred when a newly installed 6,000-gallon double-walled Flameshield aboveground storage tank was overfilled. The area was cleaned up and measures have been implemented to prevent a similar occurrence.

Background

The 6,000-gallon aboveground tank was installed in July 2008 to replace two 15,000-gallon aboveground storage tanks (ASTs) that were installed in the 1980s by the previous building owner. The new 6,000-gallon AST is filled similar to the old 15,000-gallon ASTs whereby diesel is pumped through aboveground piping inside the plant to a pipe that extends outside to the AST. The new 6,000-gallon AST has an 80% full alarm that alerts our maintenance coordinator to contact the contractor to pick up the fuel. There is also a 90% alarm that shuts off the pump from the truck "tear-down" line so that no more fuel can be pumped to the AST.

The new double-wall 6,000-gallon AST is positioned on the same concrete slab as the old 15,000-gallon ASTs. Oshkosh Corporation purchased the Harrison Street property from Leach in 2005 with the existing concrete and plastic liner secondary containment system. The concrete slab has concrete walls around it; however, the plastic liner inside the concrete walls was removed when the single-wall 15,000-gallon ASTs were removed. The liner was over 25 years old and would have been punctured by the steel supports of the new 6,000-gallon AST. The concrete slab and walls were not constructed water tight. It should be noted that concrete containment is not needed for the double-walled AST per applicable regulations, but the concrete walls were left in place for protection.

Details of Release

The new 6,000-gallon AST system had been operating successfully since July 2008. The release in April 2009 was a result of overfilling the new AST due to the contractor not being contacted when the 80% alarm went off and the 90% alarm malfunctioning. It appears that an unknown quantity of diesel fuel was released from the new AST system which then migrated into gravel surrounding the concrete slab and nearby building foundation wall taking the path of least resistance. There was an old pipe below the ground surface that penetrated the building foundation wall that allowed the diesel to migrate into a floor trench inside the plant. A floor drain to the sanitary sewer is located at the end of the trench in the floor, which allowed diesel fuel to enter the sanitary sewer.

OSHKOSH

Immediately after discovery of the source of the release, the sanitary sewer drain inlet was plugged. The old pipe in the foundation wall was removed and the hole in the wall was filled with concrete and sealed with tar. The floor trench inside the building was cleaned to remove any diesel. Outside the building, impacted gravel around the concrete pad foundation wall and clay underlying the gravel were excavated to a depth of approximately 4 feet and loaded into containers for bio-pile treatment at Glacier Ridge Landfill. The soil disposal manifests and a Certificate of Disposal for the 8.75 tons of gravel/soil brought to the landfill are attached. The area was excavated until no visual or olfactory evidence of fuel remained in the surrounding gravel and underlying silty clay. The excavation extended along the east side of the concrete slab and along the building where the former pipe entered the building foundation wall. Any diesel and perched water in the gravel above the clay was pumped out by Chief Liquid Waste and properly disposed of. After excavation was complete, the cavity was backfilled with clean stone.

Corrective Measures

Since the spill incident, the 90% alarm has been repaired and a third alarm has been installed that sends a daily electronic message of the tank volume. In addition, the vendor picks up the fuel more frequently (every 7 to 14 days) so that the AST rarely achieves 80% capacity. Although not required for a double-walled tank, steps have been taken to make the concrete structure around the aboveground storage tank liquid tight. The concrete containment is more than double the 6,000-gallon tank volume. In addition, in July 2009 an independent third party assessed the functionality of each alarm. No deficiencies in the alarm systems were identified.

In summary, the cause of the release to the environment was an unfortunate series of events. The new AST system now has three alarm systems with concrete secondary containment for more than double the 6,000-gallon double-walled tank volume.