

**Former Badger Army Ammunition Plant (BAAP)
Restoration Advisory Board Meeting
Sauk Prairie High School River Arts Center
March 21, 2024**

Time: 6:00 pm, March 21, 2024

Place: Conducted in-person at Sauk Prairie High School River Arts Center and virtually using Microsoft Teams

Attendees: Approximately 25 people attended the meeting, including 12 Restoration Advisory Board (RAB) members. Attendees are included in the attachment.

Introduction: Quang Nguyen, US Army Environmental Command (USAEC), provided the introduction and plans for the evening, followed by attendance. Mr. Nguyen explained that Dwight Hollon has left USAEC and accepted a position elsewhere. Laura Powell will serve as the new Environmental Support Manager for Badger Army Ammunition Plant BAAP. She is a US Army Reserve member and has several years of experience working at USAEC on cleanup projects. She will attend the next meeting.

Review/Approve Minutes of Last Meeting (Quang Nguyen, USAEC)

- No comments received for the January 2024 RAB meeting minutes.
- The RAB adopted the minutes as final.

Sitewide Groundwater Proposed Plan Update (Quang Nguyen, USAEC)

- Since the last RAB meeting, Army and Wisconsin Department of Natural Resources (WDNR) attorneys met on March 12, 2024, to discuss the potential human health risks associated with the Nitrocellulose Plume (NC) area. Based on the completed 2021 Feasibility Study (FS) that was approved by the state regulators, the Army stated there are no current risks for the NC area.
- The state regulators request the risk be evaluated based on state regulations with lower risk standards than the CERCLA EPA standards which BAAP is operating under. The Army and WDNR attorneys agreed to disagree on interpretation of the regulations.
- The Army will share data from 2018-2023 with WDNR for new risk calculations for the NC area.
- Further legal discussions may be needed, pending additional review by WDNR of risk analysis of the NC area.
- A RAB member expressed strong support for the more protective groundwater standard of 10^{-6} because it is an applicable or relevant and appropriate requirement, and further explained that using deed restrictions in lieu of cleaning up groundwater sets a bad precedent for the state of Wisconsin.
- The Army plans to proceed with the proposed plan to address groundwater contamination of the Propellant Burning Ground (PBG), the Deterrent Burning

Ground (DBG) and the Central Plume. The Army will conduct additional discussions with state regulators regarding data updates and the applicability of risk standards 10^{-4} versus 10^{-6} . [The Army follows CERCLA and its implementing regulations, the National Contingency Plan (NCP). If site conditions present an acceptable risk based on the reasonable and maximum exposure for current and future exposures, then a response action generally is not required. The acceptable risk ranges includes the situation where the excess cumulative upper-bound lifetime cancer risk to an individual is between one-in-ten thousand (10^{-4}) and one-in-a-million (10^{-6}) and the hazard quotient/hazard index for non-cancer adverse effects is equal to or less than 1. See 40 CFR 300.430(2)(2)(i)(A)(2) and EPA's Office of Solid Waste and Emergency Response Directive 9355.0-30, "Role of the Baseline Risk Assessment in Superfund Remedy Selection Decisions," April 22, 1991.]

- Once the final proposed plan is released to the public a 60-day public comment period will commence, and a public meeting will be held to address questions or concerns.
- The Army has already received comments on the proposed plan from the community and those will be taken into consideration along with comments received during the public comment period.

Gruber's Grove Bay (GGB) Sediment Supplemental Desktop Remedial Investigation (RI) Update (Ryan Tefft (USACE))

- The Final Supplemental Desktop Remedial Investigation was submitted to WDNR on March 15, 2024.
- The Army funded a Data Gap Investigation (DGI) and a Feasibility Study (FS). The DGI workplan will be submitted to WDNR in spring 2024.
- The DGI will commence in the summer of 2024. DGI activities will involve remobilizing to GGB for vertical and horizontal sampling to delineate the nature and extent of the contamination.
- The FS will identify and evaluate remedial alternatives considering all site-specific data, remedial action goals, and applicable legal and regulatory requirements. The optimal FS strategies for risk mitigation will be evaluated for constructability, cost, schedule, effectiveness, regulatory compliance, and community acceptance. The Army anticipates the RAB being a partner throughout the CERCLA process.

Project Management Update (Quang Nguyen, USAEC)

2nd Five-Year Review

- The Draft-Final Second Five Year Review (FYR) was completed and submitted to WDNR on December 19, 2023. Comments were received from WDNR on February 6, 2024.

- The Army is incorporating comments into the final report and anticipates the Final FYR will be sent to the RAB and the Administrative Record by the end of this month.

Settling Pond Expanded Site Inspection

- A contract for the Site Inspection (SI) was awarded December 1, 2023, which includes Final Creek, Settling Ponds 1 & 3, and Spoils Disposal Areas I, II, III, IV, and V. The Project Management Plan and the Site Health and Safety Plan tasks were funded and completed. Since the last RAB meeting, additional funding resources have been secured for the site inspection completion. The Quality Assurance Project Plan is due in April 2024. The Site-Wide Groundwater Monitoring Plan and the Emergency Response Plan are due September of 2024.

PFAS (Per-and Polyfluoroalkyl Substances) Remedial Investigation for Propellant Burning Ground

- The Army is working to secure a contract award by the first quarter of FY 2025, which would be October or November 2024.
- For the Army to fund cleanup work, a site must first be created in the Army database of record and this process takes significant effort and review, up to the Pentagon level. As of February 20, 2024, the PFAS site at Badger AAP has been approved to become a site. The Army is currently in the process of entering the new site into the database.
- Before any individual task can be added to a contract, a separate USAEC contractual mechanism called an Environmental Remediation Multiple Award (ERMA) must be in place. The Army anticipates an ERMA will be finalized by April 2024. Remedial Investigation field activities are anticipated to begin in Spring 2025 and will help define the nature and extent of PFAS contamination.

New Business

- The Technical Assistance for Public Participation (TAPP) grant is limited to \$25,000 per fiscal year and no more than \$100,000 total. BAAP has exceeded this limit, and to receive additional TAPP grant assistance a waiver must be requested. The Army encourages the RAB to first look at other options which may include using the Army's current remediation contractor to provide explanations on technical aspects of the cleanup or reaching out to regulators that are familiar with cleanup projects. The RAB can also reach out to university technical staff, professors, or volunteers such as RAB members who may have expertise and availability. Once the technical advice options have been exhausted and the need for a TAPP grant is identified, the RAB will complete a waiver letter and application for TAPP. The Army can assist in the application process. The TAPP program requires at least three community members identify a specific project in which assistance is needed. A majority of the RAB must concur assistance is needed for that specific project.

- In the meantime, the Army can assist the RAB in securing a waiver approval. The RAB can reach out later to discuss the specific project and verify the majority of RAB members concur.
- Three RAB members expressed support for pursuing a TAPP waiver.

Future Meetings

- The Army explained that Laura Powell plans on attending the July RAB meeting.
- Environmental Research Group's (ERGs) contract comes to an end March 26, 2024, and the Army is working to award a new contract by July either with ERG or another contractor.
- Upcoming RAB meeting dates:
 - July 18, 2024
 - October 17, 2024
 - January 16, 2025
 - April 17, 2025
- The Army noted USAEC will change phone systems, and all old phone numbers will be replaced by new phone numbers soon. [Requested at meeting: The number to reach Quang Nguyen (Team Lead) is (520) 674-2716; Laura Powell (Badger Environmental Support Manager) can be reached at (520) 684-6058; and Cathy Kropp (Public Affairs) can be reached at (520) 684-3758.]
- A RAB member announced that the EPA has written a new rule reducing the amount of open burning and open detonation [of waste explosives]. The RAB member recognized the new regulation as a significant milestone aided by the historic issues at BAAP.

Questions and Answers

Sitewide Groundwater Proposed Plan Update (Quang Nguyen, USAEC)

- **Q: What is the difference in the 2018-2023 data versus prior data [for human health risks associated with the NC plume]?**
A: The more recent data would be representative of current risk. Several factors, such as undiscovered sources, could contribute to a spike in concentrations. However, current data seems to indicate that all concentrations are trending downwards (Quang Nguyen, USAEC).

Gruber's Grove Bay (GGB) Sediment Remedial Investigation (RI) Update (Ryan Tefft (USACE)

- **Q: What is an example of an alternative remedial action?**
A: The Army explored the possibility of partnering with oil companies who conduct horizontal drilling to clear shallow lake beds of sediment. The sediment would be vacuumed and deposited into settling ponds to evaporate. However, there are a wide range of technical and remedial actions that are possible through USACE (Ryan Tefft, USACE).

- Q: Is the risk assessment going to include lead, copper, arsenic, nitroglycerine, Polychlorinated biphenyls, and methylmercury?**

A: An answer can be provided within a couple of days (Ryan Tefft, USACE). [As identified in the Final Desktop Supplemental RI report, the sediment investigation report (Stone and Webster, 2000) indicated that the removal of mercury contamination would result in the removal of these co-contaminants from Gruber's Grove Bay. Thus, the risk assessment for these co-contaminants was not considered necessary to define the scope of alternative remedial actions. Further clarification can be provided in subsequent RAB Meetings with input from WDNR.]
- Q: Is the Army still anticipating 2025 for on the ground activity [at GGB]?**

A: The DGI activities are anticipated to occur in Summer 2024. Remedial activities would follow recommendations from the DGI and FS. Activities for 2025 are not yet certain (Ryan Tefft, USACE).
- Q: When the DGI activities are conducted what can the community expect to see in GGB?**

A: It will look like the 2001 sampling event. There will be people with long poles on boats grabbing samples from the bottom of the bay. (Ryan Tefft, USACE).

Project Management Update (Quang Nguyen, USAEC)

2nd Five-Year Review

- Q: Can the RAB comment on the FYR before it is final?**

A: The Army will verify and respond [after the meeting] (Quang Nguyen, USAEC). [Emailed to RAB April 3, 2024: The EPA guidance does not list public review of the report prior to signature as a required activity. Additionally, the current FYR contract is expiring soon and only included the required reviews by regulators. However, the Army will consider incorporating RAB members reviews in future FYR contracts prior to finalization.]

Settling Pond Expanded Site Inspection

- Q: Regarding the settling pond area, does WDNR have an emergency response plan for that area now?**

A1: This is the responsibility of the WDNR Fire Services. They are aware of the need to evaluate the future of prescribed burns and are working on addressing the issue (Isaac Ross, WDNR).
- A2:** The FYR had recommendations to address land use controls and signage in the area (Quang Nguyen, USAEC).
- Q: Can WDNR comment on the sludge areas near the settling ponds and what DNT were found in the soils?**

A: The initial report that was conducted is included on the WDNR website. A link can be shared with the RAB after the meeting (Isaac Ross, WDNR). [Direct link to the file on BRRTS on the Web:
<https://apps.dnr.wi.gov/botw/GetActivityDetail.do?crumb=2&siteId=30709900&dsn=581332>]

- **Q: Can the Army elaborate on the fieldwork that is planned for the summer 2024?**

A: The work will include a small push rig or shovels to collect samples. In the past, hand augers or shovels were used to ensure minimal disturbance. This involves collecting samples for all the explosives and all the chemicals that were once in production. This will include work at settling pond one, settling pond three and the disposal areas. Settling pond two will not be included because it was already conducted (Joel Janssen, Spec Pro Services).

PFAS (Per-and Polyfluoroalkyl Substances) Remedial Investigation for Propellant Burning Ground

- **Q: We are still calling for a PFAS investigation in the DBG area. Will this occur as part of the new study?**

A: Yes, now that we have a site established for PBG, the Army can consider additional information and conduct a supplemental site inspection (SI) at other locations that may have been missed in the previous SI to see if there is a presence or absence of PFAS (Quang Nguyen, USAEC).

ATTENDEES

RAB Members Present

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|-----|-------------------|-------------------------|
| 1. | Charlie Wilhelm | At Large |
| 2. | Jeremiah Yee | WDHS |
| 3. | Doug Gjerston | Town of Sumpter |
| 4. | Michele Hopp | Community Co-Chair |
| 5. | Issac Ross | WDNR |
| 6. | Bill Stehling | Sauk City |
| 7. | Adam Weiss | Town of Prairie du Sac |
| 8. | Randy Poelma | Ho-Chunk Nation |
| 9. | Mike Gleason | Lake Wisconsin Alliance |
| 10. | Chris Hanson | Town of Merrimac |
| 11. | Valerie McAuliffe | Sauk County Board |
| 12. | Laura Olah | CSWAB |

Army and Army Contractors

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| 1. | Joel Janssen | SpecPro Services |
| 2. | Cathy Kropp | USAEC |
| 3. | Sergio Celis | Environmental Research Group |
| 4. | Kay Toye | Environmental Research Group |
| 5. | Quang Nguyen | USAEC |
| 6. | Cathy Kropp | USAEC |
| 7. | Ryan Tefft | USACE |

Visitors

- | | | |
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| 1. | Joe Block | Guest |
| 2. | Wendy Carlson | CSWAB Alternate |
| 3. | Xiaochun Zhang | WDNR |
| 4. | Jelena Banks | Guest |
| 5. | Stephanie Brensike | Town of Merrimac Alternate |
| 6. | Seth Reedy | Guest |
| 7. | Wendy Carlson | CSWAB alternate |