

March 17, 2015

Mr. Robert Sitton – Commander's Representative
Badger Army Ammunition Plant
S7560 Highway 12
North Freedom, WI 53951

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Final Case Closure with Continuing Obligations
Badger Army Ammunition Plant Parcel R, S7560 Highway 12, North Freedom, WI; Sauk County
DNR BRRTS Activity #: 02-57-563348

Dear Mr Sitton:

The Department of Natural Resources (DNR) considers the Parcel R case closed, with two continuing obligations. No further investigation or remediation is required at this time. However, you and future property owners, and occupants must comply with the continuing obligations as explained in the conditions of closure in this letter. Please read over this letter closely to ensure that the Army complies with all conditions and other on-going requirements. Provide this letter to anyone who purchases, rents or leases this property from you.

This closure decision includes the following determinations. Closure was granted for the following sites within Parcel R at which a remedial investigation and a remedial action were completed:

- Fire Training and Practice Area
- Powerhouse #1 Steam Traps
- Powerhouse #1 Above-Ground Storage Tanks and Impacted Soil
- Shop Change House (petroleum fuel dispenser tank and piping)
- Laboratories Area and Solvent Storage Building
- Combined Shops and Main Warehouse
- Sewer Lines
- Wood Grinder Processing/Storage Area
(Building) Post-Demolition Sampling (and remediation)

A determination of no-further-action is included in the closure decision for the following sites within Parcel R at which a remedial investigation was completed:

- Powerhouse #1 – Former Collection Pit
- Tram Shop
- Metrology Lab

A determination of no-action-required was issued for the remaining area of Parcel R.

This closure decision does not include the following areas in Parcel R that have been previously closed or similarly addressed by DNR (closure date is in parentheses): soil impacted by PCBs in the Main Transformer Yard at Powerhouse #1(1995); a fuel oil leak approximately 40 feet west of Powerhouse #1 (2007); petroleum-

impacted soil near the Locomotive Shop (2012); soil at the Oil and Solvent Store (2007); lead-impacted soil near the Lead Burning House (2010); and a diesel fuel spill east of Account #0227-3 (2009).

This final closure decision is based on the correspondence and data provided, and is issued under chs. NR 726 and 727, Wisconsin Administrative Code. The South Central Region (SCR) Closure Committee reviewed the request for closure on March 5, 2015. This committee reviewed this environmental remediation case for compliance with state laws and standards.

The conditions of closure and continuing obligations required were based on the assumption that the Parcel R property will be used for residential purposes, although this is in actuality not possible because of use restrictions required by the Army. The Ho Chunk Nation, future owner of this parcel and additional adjacent land, is considering using this parcel for agricultural (pasture) purposes.

Two groundwater monitoring wells are located on Parcel R and were installed primarily to monitor the Laboratories Area and Solvent Storage Building, located within this parcel. These wells will remain for future monitoring of groundwater in this northwest area of BAAP, but not this parcel specifically. These wells remain the responsibility of the Army until they are properly abandoned after DNR approval. These two wells are identified on the attached "Groundwater Monitoring Well Location Map", Figure B.3.d.

Continuing Obligations

The continuing obligations for this site are summarized below. Further details on actions required are found in the Closure Conditions section below.

- Residual soil contamination may exist that would have to be properly managed should it be excavated or removed.
- One or more monitoring wells were approved to be kept for further monitoring of groundwater quality of the larger area of this and adjacent parcels. Annual inspections are required and the wells must be properly filled and sealed when monitoring has been completed.

The DNR fact sheet, "Continuing Obligations for Environmental Protection", RR-819, helps to explain a property owner's responsibility for continuing obligations on their property. The fact sheet may be obtained at <http://dnr.wi.gov/files/PDF/pubs/rr/RR819.pdf>.

GIS Registry

This site will be included on the Bureau for Remediation and Redevelopment Tracking System (BRRTS on the Web) at <http://dnr.wi.gov/topic/Brownfields/rasm.html>, to provide public notice of residual contamination and of any continuing obligations. The site can also be viewed on the Remediation and Redevelopment Sites Map (RRSM), a map view, under the Geographic Information System (GIS) Registry layer, at the same web address.

DNR approval prior to well construction or reconstruction is required for all sites shown on the GIS Registry, in accordance with s. NR 812.09 (4) (w), Wis. Adm. Code. This requirement applies to private drinking water wells and high capacity wells. To obtain approval, complete and submit Form 3300-254 to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at <http://dnr.wi.gov/topic/wells/documents/3300254.pdf>.

All site information is also on file at the SCR DNR office at 3911 Fish Hatchery Road, Fitchburg, WI. This letter and information that was submitted with your closure request application can be found as a Portable Document Format (PDF) in BRRTS on the Web.

Closure Conditions

Compliance with the requirements of this letter is a responsibility to which the Army and any subsequent property owners must adhere. If these requirements are not followed, the DNR may take enforcement action under s.

292.11, Wisconsin Statutes, to ensure compliance with the specified requirements, limitations or other conditions related to the property.

Please send written notifications in accordance with the following requirements to:

Department of Natural Resources
Attn: Remediation and Redevelopment Program Environmental Program Associate
3911 Fish Hatchery Road
Fitchburg, WI 53711

Residual Soil Contamination (ch. NR 718, or ch. 289, Stats.; chs. 500 to 536, Wis. Adm. Code)

All current and future owners and occupants of the property need to be aware that excavation of any contaminated soil may pose an inhalation or other direct contact hazard and as a result special precautions may need to be taken to prevent a direct contact health threat to humans.

Continued Monitoring Approved

Your request for continued monitoring of the two monitoring wells located in Parcel R and shown on the attached map is approved. These wells, used as part of a monitoring well network to monitor groundwater quality of the northwest area of BAAP, are shown on Figure B.3.d, which is included in the closure request submittal received by the Department on February 11, 2015. In the future, sampling results must be submitted to the DNR within 30 days of your receipt of the results. An annual inspection of these wells is required to verify the integrity of the monitoring well construction, starting one year after the date of this letter. The inspection log shall be maintained on site, and be made available to the DNR upon request.

You may be held liable for any problems associated with the monitoring wells if they create a conduit for contaminants to enter groundwater. Once monitoring of these wells ends, the Army or its agent is required to notify the DNR, to properly fill and seal each well, and to submit the required documentation to the DNR.


In Closing

Please be aware that the case may be reopened pursuant to s. NR 727.13, Wis. Adm. Code, for any of the following situations:

- if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment;
- if the property owner does not comply with the conditions of closure, with any deed restrictions applied to the property, or with a certificate of completion issued under s. 292.15, Wis. Stats; or
- if a property owner fails to maintain or comply with a continuing obligation (imposed under this closure approval letter).

The DNR appreciates your efforts to restore the environment at this site. If you have any questions regarding this closure decision or anything outlined in this letter, please contact Will Myer at 608.273.5613 or at will.myers@wisconsin.gov.

Sincerely,



Linda Hanefeld, Team Supervisor
SCR Remediation & Redevelopment Program

Attachment: Figure B.3.d – Groundwater Monitoring Well Location Map, Parcel R

c (via e-mail): Brian Jacobs – BTS, LLC
Laura Olah - CSWAB