



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

CERTIFIED MAIL –  
RETURN RECEIPT REQUESTED

L-8J

Mr. James D. Daniel  
Chief, Cleanup and Munitions Response Division  
US Army Environmental Command  
2450 Connel Road, Building 2264  
Fort Sam Houston, Texas 78234-7664

Re: Request for Clarification, Badger Army Ammunition Plant Restoration Advisory Board  
(BAAP RAB) Reorganization, 2 Badger Road, Baraboo, Wisconsin 53913  
WI 9210020054

Dear Mr. Daniels:

United States Environmental Protection Agency received a letter dated June 21, 2012 from Joan Kenney stating that "Badger has conducted a community survey and determined that the Restoration Advisory Board for the installation needs to be reformed to better represent the various interests in the community". The letter formally requested EPA's Bob Egan to participate in a selection panel created to select new members for the BAAP RAB. This letter followed a presentation at the May 7, 2012 RAB where Putnam Roby Williamson Communications (PRW) presented the findings of their survey which concluded that half of respondents from the community, the RAB and public officials feel the RAB does not represent their interests or interests of community/local citizens. This conclusion led to recommendations for making the RAB more representative.

The recommendations included:

- Forming a selection panel as outlined in the RAB Rule in part to determine existing members who represent only one community interest and retain one member for each interest group
- select co-chairs
- develop operating procedures

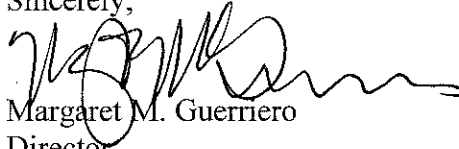
In a phone call between EPA's Michelle Mullin and BAAP's Joan Kenney on August 7, 2012, Joan affirmed that the recommendations presented by PRW were being taken by Army Environmental Command to re-organize the BAAP RAB. Ms. Kenney further stated that existing RAB members were required to re-apply for their positions, and that some members may not be able to continue serving in order to limit the number of representatives for each community interest group to one. Joan also stated that RAB members would have term limits.

Based upon our understanding of the RAB rule, 32 CFR Part 202, there is no requirement for existing members to re-apply. Nor is there any justification for removing currently participating members due to multiple members representing the same community interest group, or limiting member's participation through term limits. Furthermore, the BAAP RAB currently has operating procedures and co-chairs. The existing BAAP RAB operating procedures specifically state that no member shall be subject to term limits. Lastly, we are aware that the local governments want to be part of the RAB and it is our understanding that all of the following local governments want to have a representative on the RAB--Merrimac, Sumpter, Town and Village of Prairie du Sac and Sauk County. We believe it would be important to allow these entities to participate on the RAB.

Given Ms. Kenney's solicitation of an EPA representative for the selection panel, as well as community concerns regarding the RAB reorganization, EPA would like clarification as to why Army Environmental Command has chosen this path. EPA requires further clarification of the above points before we are able to respond to Ms. Kenney's solicitation of our participation in the RAB selection panel.

EPA proposes arranging a conference call with you to discuss the RAB process and our participation on the selection panel within the next two weeks. The imminent departure of Michelle Mullin from our office dictates the need to resolve this issue for us. Please contact Jose Cisneros at 312-886-6945 to arrange the call.

Sincerely,



Margaret M. Guerriero  
Director

Land and Chemicals Division

cc: Joan Kenney