

December 7, 2015

Will Myers
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Madison, WI 53711

SENT BY ELECTRONIC MAIL

RE: CSWAB Recommendations for Additional Residential Well Testing and Split Sampling at Water's Edge

Dear Mr. Myers:

At the November 17, 2015 public meeting on groundwater conditions at and near Badger Army Ammunition Plant, the facility reported that 52 residential wells are tested annually by the Army. One residential well at Weigand's Bay North is sampled semi-annually. Army contractors reported that all residential wells are tested for all six isomers of dinitrotoluene (DNT) and some are also tested for volatile organic compounds. The most recent round of sampling did not identify any exceedances of Wisconsin Groundwater Enforcement Standards.

The Army has identified four distinct groundwater contaminant plumes originating from inside Badger. The Central Plume has moved beyond the plant boundary in the vicinity of Gruber's Grove Bay in the Town of Sumpter. DNT is the principal contaminant of concern associated with this plume, and 2,6-DNT is believed to be the main isomer associated with this plume, DNR officials reported. Consequently, the recent detection of low levels of 2,4-DNT and 3,4-DNT are very suspect, DNR said. Officials also noted that all positive test results are J-flagged. The presence of a J qualifier attached to an analytical result indicates that the chemical is positively identified but the associated concentration is estimated.

Officials said that a total of 16 residential wells were tested at the Water's Edge neighborhood on Gruber's Grove Bay. Of these 16 wells, 9 had DNT detections. Both shallow and deep wells are affected, officials said.

However, in terms of next steps, officials reported that only 3 of the 16 regularly-tested residential wells would be re-tested in the near term.

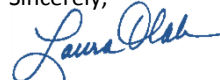
Additionally, no testing for degradation products of DNT is proposed. In water and soil, DNT degrades into a variety of degradation products through several mechanisms in the environment, including oxidation, photolysis, ozonation, chlorination and biodegradation. (Source: U.S. EPA, *Technical Fact Sheet – Dinitrotoluene (DNT)*, January 2014.)

After careful discussion and consideration, including consultation with affected residents in the Water's Edge neighborhood, CSWAB is recommending the following:

1. All 16 residential wells at Water's Edge should be resampled as soon as possible.
2. This testing should include split samples. At the public meeting, at least two other labs – one in Colorado and CT Labs in Wisconsin – were identified as appropriately certified.
3. All residential wells should be tested for all of the degradation products of DNT.

Thank you for your consideration of our recommendations.

Sincerely,



Laura Olah, Executive Director

CC: Robert M. (Mike) Sitton, U.S. Army, Badger Army Ammunition Plant
Kristina S. Curley, U.S. Army Environmental Command