

**From:** Kuehling, Harlan H - DNR  
**Sent:** Tuesday, August 03, 2010 3:25 PM  
**To:** Karr, Craig L - DNR  
**Cc:** Pierce, Eileen F - DNR  
**Subject:** RE: Choosing Clean-up Levels for Contaminated Soil in the Settling Ponds Area  
Craig,

It is good to hear that remaining contamination in any specific area will be considered when proposing recreational use for that area. This is our assumption when considering the criteria to be applied to a given area for clean-up and for case closure. I will keep you informed about these considerations, but can say that, at this time, we are seriously considering accepting that an annual use by any person "recreating" on the soil of the settling ponds, Final Creek, and the soils disposal areas won't exceed 77 days, as proposed by the Army.

Regarding the concern by the Planning and Land Use Committee, a revision will likely occur of the 1995 remediation goals related to human health risk from direct contact with the soil of the Settling Ponds, etc., with the revision being based significantly on the change in projected land use to recreation. (A second decision regarding impacts to the terrestrial ecosystem from the soil must yet be made by DNR.) Any revision to the 1995 remediation goals set for other areas on the Badger property would be considered only if the Army requests one. Such a request would be reviewed by using current R&R Program rules, policies, and decision precedents.

I hope that this helps.

Hank

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**From:** Karr, Craig L - DNR  
**Sent:** Monday, August 02, 2010 8:11 AM  
**To:** Kuehling, Harlan H - DNR  
**Subject:** RE: Choosing Clean-up Levels for Contaminated Soil in the Settling Ponds Area

Hank:

Thanks much for keeping me in the loop.

I understand the potential limit to usage in the area.

I agree with your general understanding that limited recreational uses, such as hiking trails, are the most likely use of the area.

One concern expressed by the Planning and Land Use Committee was whether this reduction of clean-up standards might have an impact on other areas already closed or areas yet to be closed.

In other words, might the standards in other areas also be changed?

Craig

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**From:** Kuehling, Harlan H - DNR  
**Sent:** Thursday, July 29, 2010 11:50 AM  
**To:** Karr, Craig L - DNR  
**Cc:** Pierce, Eileen F - DNR  
**Subject:** Choosing Clean-up Levels for Contaminated Soil in the Settling Ponds Area

Hi, Craig,

Last November, the Army requested review of a proposal to revise contaminated soil clean-up standards that had been issued by the DNR in 1995 for, among other areas, Final Creek, the Settling Ponds, and the associated Spoils Disposal Areas. After working on this issue sporadically, I will be finishing up the review process within the next week or two at the most. The Army's proposal and our review is only the first step in eventually changing the clean-up levels for various contaminants in the Settling Ponds area soils, that first step to be followed by a final proposal that will be used in an alternate feasibility study, ultimately ending in a plan

modification approval from the R&R Program.

My intent is to keep you informed as we go through the R&R Program's regulatory process for this area because, when this case is closed, there may be some land uses that should be avoided. I'm sure that some shallow contaminated soil will remain in the Settling Ponds, Final Creek, and the Spoils Disposal Areas. Clean-up goals may assume recreational use rather than more frequent use as is normally the case for most sites in our program as we consider case closure. Although the number of days of use assumed for recreational use in contaminant exposure calculations is around 75 and the Army is proposing to use 77 days, there will still be land uses that would be good to avoid. It is hard to imagine the Settling Ponds and Final Creek being used extensively for any designated activity as part of the Sauk Prairie Recreational Area, although I'm guessing that a hiking trail might be acceptable, for example, but more intensive uses such as a campground or an ATV trail where the vegetation would be removed should be avoided.

Included here is 10 pages of information on this topic that I sent to our case closure committee for their opinion on the Army's proposal. The file is somewhat large (1 MG) so you may want to move it from your Inbox soon. The summary memo is 3-4 pages and probably too detailed for your purposes, but it may give you an idea of what the proposal is about and our consideration of it.

<< File: 20100729095255978.pdf >>

Contact me if you have any questions, comments, or concerns. Thanks, Craig.

Hank

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