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September 15, 2011

Ms. Joan Kenney
Installation Director
Badger Army Ammunition Plant
2 Badger Road
Baraboo WI 53913-5000

Subject: Need for Evaluation of DNT Isomers in Soil – Badger Army Ammunition Plant, Sauk County

Dear Ms. Kenney:

Soil testing at the Badger Army Ammunition Plant (BAAP) has included two isomers of dinitrotoluene (DNT); 2,4-DNT and 2,6-DNT. We are requiring that future soil tests at the Badger Army Ammunition Plant include all six isomers of DNT, wherever DNT is a contaminant of concern. This requirement is consistent with NR 716, Wisconsin Administrative Code, which states that responsible parties must “Determine the nature, degree and extent, both areal and vertical, of the hazardous substances or environmental pollution in all affected media.”

This additional testing requirement will aid in the evaluation of potential direct contact risks and possible sources for leaching of DNT to groundwater, and will test the idea that the ratios of DNT isomers in soil at the facility approximate those found in technical grade DNT.

If the additional isomers are detected, the Army should develop cleanup standards for direct contact and groundwater leaching, in accordance with the requirements of NR 720.11 and NR720.09, Wisconsin Administrative Code. Remediation objectives should address the risks posed by all DNT isomers. Alternatively, if the risks posed by the less common DNT isomers are consistently and significantly lower than the risks posed 2,4-DNT and 2,6-DNT, we will be open to discussing the future need for this testing requirement.

Sincerely,

Jeff Ackerman
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cc: Clair Ruenger – SpecPro, Inc.
Laura Olah, CSWAB