



September 9, 2020

Bryan Lynch, Physical Scientist (Environmental)
Army Environmental Command, Midwest Services Division
2450 Connell Rd
Fort Sam Houston, TX 78234

Subject: Request for Additional PFAS Sampling
Badger Army Ammunition Plant, Sauk County, Wisconsin
BRRTS #02-57-001002

Dear Mr. Lynch:

The Wisconsin Department of Natural Resources (Department) previously reviewed the document entitled "Draft Final Preliminary Assessment of Per- and Polyfluoroalkyl Substances, Badger Army Ammunition Plant, Sauk County, Wisconsin, dated March 2020 prepared for U.S. Army Corps of Engineers, Baltimore District by Arcadis U.S. Inc." The Department provided comments on that document (PA/SI) in a letter to you dated May 15, 2020. Those comments were focused on our authority to regulate PFAS compounds, identified the list of parameters that should be included in the analytical testing program, and referenced the process for establishing site-specific cleanup standards.

The sampling conducted during the PA/SI was focused on a few areas of the site that were thought to be the most likely to have PFAS contamination based on a review of limited historical information. The PA/SI discovered detectable levels of PFAS compounds in soil and groundwater at several locations. Although the detected PFAS concentrations in groundwater were generally below the Wisconsin Department of Health Services' recommended groundwater quality standard of 20 ppt of PFOA and PFOS separately or combined, their presence, and the presence of PFAS compounds in some soil samples, suggests the possibility of a discharge to the environment of these chemicals from site activities. The Department believes there is considerable uncertainty regarding potential discharges of PFAS at this site.

Therefore, the Department is requesting that a more comprehensive investigation of the nature and extent of PFAS in soil and groundwater be conducted at the site as defined in NR 716.09. The parameters for testing should follow those outlined in our May 15, 2020 letter.

We want to thank the Army for their work on this challenging project. Please feel free to contact me with any questions or comments by telephone at 608-293-0112 or via e-mail at stevenl.martin@wisconsin.gov.

Sincerely,

Steven L. Martin, P.G.
South Central Region Team Supervisor
Remediation & Redevelopment Program