



July 17, 2024

Laura Powell  
U.S. Army Environmental Command  
2455 Reynolds Road  
Joint Base San Antonio Fort Sam Houston, TX 78234

SENT BY ELECTRONIC MAIL

Subject: Nitrocellulose Production Area Plume  
Former Badger Army Ammunition Plant, Baraboo, WI  
DNR BRRTS Activity #02-57-001002

Dear Laura Powell:

The U.S. Army Environmental Command (Army) and the Wisconsin Department of Natural Resources (DNR) have been in correspondence regarding the Draft Final Proposed Plan for Site-Wide Groundwater at the Former Badger Army Ammunition Plant (Draft Proposed Plan). The Draft Proposed Plan identifies the Army's preferred remedial alternative to address contaminated groundwater in the Central Plume, Deterrent Burning Ground Plume, and Propellant Burning Ground Plume. No remedial alternatives were evaluated for the Nitrocellulose Production Area Plume (Nitrocellulose Plume) and no remedial action is proposed to be taken. In the Draft Proposed Plan, the Army stated that, based on its Human Health Risk Assessment, the Nitrocellulose Plume "does not pose a hypothetical future risk to groundwater usage by humans." The DNR does not concur with the Army's determination and in June and October 2023 provided comments on the Draft Proposed Plan requesting that the Army evaluate remedial alternatives to address groundwater contamination in the Nitrocellulose Plume. In a November 2023 response to DNR's comments on the Draft Proposed Plan, the Army indicated that it would update the Draft Proposed Plan to include an evaluation of remedial alternatives and remedy selection for the Nitrocellulose Plume. Subsequently, the Army in March 2024 indicated to the DNR that it does not intend to conduct this evaluation.

The Nitrocellulose Plume is located on land held in trust for the Ho-Chunk Nation and the groundwater plume may be migrating on to land owned by DNR. The Army is addressing this site under CERCLA and is responsible for complying with any applicable requirements or policies regarding tribal consultation. The DNR requests that the Army actively engage with the Ho-Chunk Nation regarding the Draft Proposed Plan and the Army's determination that it is not necessary to evaluate remedial alternatives for the Nitrocellulose Plume. The DNR intends to engage with the Ho-Chunk Nation before issuing any determination on the Draft Proposed Plan. To help inform the DNR's discussion with the Ho-Chunk Nation, the DNR requests a written response from the Army on how the Army has engaged with the Ho-Chunk Nation to date and what additional engagement the Army plans to have with the Ho-Chunk Nation.

The DNR appreciates your efforts to investigate and remediate this site. If you have any questions, please contact me at (414) 750-7140 or [Issac.Ross@wisconsin.gov](mailto:Issac.Ross@wisconsin.gov) or the DNR Project Manager, Luke Lampo at (608) 206-5809 or [luke.lampo@wisconsin.gov](mailto:luke.lampo@wisconsin.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Issac A. Ross', with a long horizontal flourish extending to the right.

Issac A. Ross  
Regional Supervisor  
South Central Region, Fitchburg, WI  
Remediation & Redevelopment Program

cc: Quang Nguyen, Army  
Issac Ross, DNR SCR Region  
Ben Cornelius, DNR  
Shelly Allness, DNR SCR Region