



DEPARTMENT OF THE ARMY  
BADGER ARMY AMMUNITION PLANT  
S7560 U.S. HIGHWAY 12  
NORTH FREEDOM, WISCONSIN 53951-9588

December 4, 2013

Dear Neighbors,

You are invited to a public meeting on Wednesday, December 11, 2013. The focus will be groundwater monitoring and management around Badger Army Ammunition Plant (Badger). Please see the enclosed agenda.

While the federal furloughs did not have a significant impact on activities at the installation, they did delay the public meeting originally planned for October. A brief update on activities at Badger is provided below.

**Over the summer and fall the Army completed the remaining needed removal of structures and soils** at Badger. This included removing 71,500 cubic yards of soil from the Settling Ponds area, clean up of the areas used for recycling and scrap sales, and closure of the on-site landfill.

We will submit the last of the necessary documents on this work to the Wisconsin Department of Natural Resources (WDNR) over the next few months and add those documents to the information repositories at the public libraries.

Once the WDNR reviews our reports and agrees no further action is needed on a parcel, the Army sends a package of information on the current environmental condition of the property to the General Services Administration (GSA). They, in turn, send an assignment letter to the receiving government agency that will eventually control that parcel.

The National Park Service has been accepting parcels on behalf of the WDNR. You can find out more about the progress of the WDNR's master planning effort for their property at Badger, called the Sauk Prairie Recreation Area on their website <http://dnr.wi.gov/topic/Lands/MasterPlanning/SaukPrairie/>.

The Department of Health and Human Services sponsors the Bluffview Sanitary District in the Town of Sumpter. The Town has received the drinking water well and wastewater treatment plant parcels. The Town of Sumpter will also receive the three historic cemeteries on the Badger lands.

The Bureau of Indian Affairs is responsible for accepting parcels on behalf of the Ho-Chunk Nation but the property has not yet transferred.

**Groundwater activities continue.** The Army is continuing to implement the remedies approved by the WDNR following its public comment period. Those remedial actions are detailed in WDNR's June 28, 2012 "Final Determination of Feasibility for an Alternative Groundwater Remedial Strategy."

If you are interested in more detailed information on the remediation program, remedies in place, and remedies still being implemented at Badger, you can review CDs of the actual documents at the Sauk City Library and the Ruth Culver Memorial Library. The WDNR also posts information on Badger cleanup at their Sauk Prairie Recreation Area master planning website. Scroll down and select the "Cleanup" tab. Copies of their latest postings are provided with this letter for your information. Also the Town of Merrimac website <http://www.tn.merrimac.wi.gov/MerrimacWaterDistrict.htm> has a summary of frequently asked questions about the proposed district water system.

To summarize, this summer the Army completed the work on the Badger property that will allow the rest of the parcels to transfer to the new land managers. The ongoing groundwater management and monitoring program will be the focus of the meeting on December 11 at 6:00 p.m. At that meeting we will cover Monitored Natural Attenuation (MNA) and groundwater issues in more detail. If you are interested in the groundwater actions I mentioned in this letter, I hope you will attend.

Sincerely,



Joan M. Kenney  
Commander's Representative  
Badger Army Ammunition Plant

Enclosures

Based on WDNR's approval, the Army discontinued use of the Interim Remedial Measure (IRM) groundwater treatment facility at the Propellant Burning Ground source area in December 2012. Groundwater monitoring conducted since that time shows conditions at the source area remain stable. The cap over the source area is working as designed, preventing precipitation from moving down through the burning ground soils.

Data gathered from sampling related to the Modified Interim Remedial Measure (MIRM) groundwater treatment system shows that it has reached the point where it is removing very little contamination. This is due to the reduced levels of contamination in the groundwater in the area it treats south of the Propellant Burning Ground source area on the installation. There is no treatment of any off-site portions of the plume.

In accordance with the approved remedial strategy, the Army will submit a plan to WDNR for a phased shut down of the MIRM in the next few weeks. The five groundwater capture wells will be turned off over time while the Army continues to monitor conditions to make sure that there are no major changes in groundwater contaminant level or movement. WDNR plan approval is required prior to the start of the system shutdown.

In preparation for the shutdown, twelve new monitoring wells are being installed at the southwest corner of the installation to add to the extensive monitoring well network in that area. The Army and WDNR also are evaluating the existing monitoring well locations to fine tune the continued tracking of groundwater conditions on and off the installation. This is part of the monitored natural attenuation (MNA) portion of the remedy.

Another part of the groundwater remedy approved by WDNR included **evaluating the monitoring of private residential wells**. The Army and WDNR agreed to decrease or eliminate monitoring at some residences where no problems have been found in previous years. Information used to make the decision included a well's lack of previous contaminant detections, location in regard to Badger's historic contaminant sources, and data regarding groundwater flow. The Army included information on the sampling schedule changes in the letters reporting the August 2013 sampling results recently sent to affected well owners. Under this modified sampling plan, the Army will continue to sample 51 residential wells annually and sample one residential well twice a year.

The other part of the Army's proposal, implementing a district water system, is currently on hold.

For Gruber's Grove Bay, the Army is evaluating what additional actions will be effective to achieve site closure and WDNR approval.

There are ongoing monitoring and maintenance requirements for the capped landfills and remediation sites at Badger. The Army will continue to manage these as part of its long-term environmental management program for Badger.

**PUBLIC MEETING AGENDA – GROUNDWATER UPDATE  
for Badger Army Ammunition Plant**

**Wednesday December 11, 2013, 6:00 pm**

**Location:** Sauk Prairie School District's River Arts Center Gallery  
105 Ninth Street  
Prairie du Sac, WI 53578-1428

- I. Welcome and Introductions (5 minutes)**
- II. Agenda and meeting format review – Facilitator, Henry Shah (5 minutes)**
- III. Recap of Badger AAP activities – Joan Kenney (10 minutes)**
- IV. Monitored natural attenuation (MNA) – Woody Myers (30 minutes)**
- V. Groundwater monitoring – Joel Janssen (10 minutes)**
- VI. IRM/MIRM status– Joel Janssen (20 minutes)**
- VII. Public comment – Facilitator (3 minute limit per speaker)**
- VIII. Adjournment**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

November 27, 2013

REPORT TO THE AGENCIES

LU-9J

Ms. Laura Olah  
Executive Director  
Citizens for Safe Water Around Badger (CSWAB)  
E12629 Weigand's Bay South  
Merrimac, Wisconsin 53561

Dear Ms. Olah:

I did not receive your email and attached letter dated November 12, 2013. However, on November 20, 2013, U.S. Representative Mark Pocan's office forwarded the email and letter to EPA. In your letter you ask EPA to respond to five bullet points. Below are the bullet points followed by EPA's response.

1. Please explain the current authority for cleanup and public participation at Badger. What federal laws and directives, such as RCRA and Executive Orders pertaining to environmental justice, are applicable?

The Wisconsin Department of Natural Resources (WDNR) is the lead agency responsible for cleanup at the Badger Army Ammunition Plant (BAAP). EPA and WDNR have a Memorandum of Agreement (MOA) (attached) which recognizes WDNR as having laws and regulations at least as stringent as those of EPA under the Resource Conservation and Recovery Act (RCRA). Wisconsin state laws should result in cleanups that meet federal regulatory requirements and the MOA authorizes the state of Wisconsin to implement corrective action in lieu of EPA.

Corrective action at BAAP is being implemented under state authority of the "spills law" (Statute 292) and the cleanup rules under Wisconsin Administrative Code NR 700, et. seq., and not under a RCRA permit. EPA regulations do not require public participation for corrective action activities that are not imposed under a RCRA permit. However, EPA's policy is that the same level of public participation requirements imposed under a permit should generally apply under other mechanisms. EPA recommends that when corrective action is conducted under alternate authorities in lieu of a RCRA permit, public participation occurs when EPA first becomes involved at a site, during remedy selection, and prior to making the decision that corrective action is complete. WDNR has requirements under Wisconsin Administrative Code NR 714 similar to EPA's recommendations.

Specifically, Wisconsin Administrative Code NR 714, "The department shall maintain a list of persons interested in a specific site or facility and provide them with copies of any department approvals or rejections for all of the following documents:

- (a) Site investigation workplans.
- (b) Site investigation reports.
- (c) Remedial action options reports.
- (d) Requests for case closure."

WDNR has been meeting or exceeding the public participation activities under Wisconsin Administrative Code NR 714. Also, please see the response to bullet 5.

With respect to Environmental Justice (EJ) concerns at BAAP, the BAAP area does not meet the criteria that EPA uses to identify locations where EJ may be an issue. Also, even if the BAAP area met EJ criteria, EPA's recommendations for increased public participation would likely be met by WDNR's current public participation activities.

2. Why have previous permit modifications been publicly noticed with opportunities for public comment while this most recent modification did not?

Corrective action at BAAP is not being conducted under a permit and there are no permit modifications associated with BAAP corrective action. The groundwater monitoring plan modification approved by WDNR on September 5, 2013, was not a permit modification. As an authorized state, WDNR manages public participation at BAAP and has been providing public participation opportunities in accordance with Wisconsin Administrative Code NR 714. In addition, WDNR has provided several public participation opportunities this year for corrective action activities (see response to bullet 5 below). It is not the general practice of WDNR or EPA to provide public participation for revisions to approved monitoring plans.

Also, in 2012, a 45 day public comment period (extended to 55 days in response to a request from a RAB member) was held from February 15 to April 12 for the Army's Alternative Feasibility Report for Groundwater. The flexibility to modify the groundwater monitoring program was described during the public outreach process for this document. Comments were received, considered and responded to prior to the State's issuance of the June 28, 2012 "Final Determination of Feasibility for an Alternative Groundwater Remedial Strategy at and near the Badger Army Ammunition Plant." Comments received about residential well testing were addressed by WDNR in the Final Determination.

3. How can the EPA assist in facilitating and securing an opportunity for public participation and formal comment on all permit modifications (including this most recent) and other decision-making that impacts the environmental health of our community?

Corrective action at BAAP is not being conducted under a permit and there are no permit modifications associated with BAAP corrective action. WDNR has been providing public participation opportunities in accordance with Wisconsin Administrative Code NR 714, and has provided public participation opportunities beyond the Code requirements. In addition, WDNR has provided several public participation opportunities this year (see response to bullet 5 below). Also, the Army will be holding a public meeting in December, 2013 to provide an update on corrective action activities (including groundwater monitoring) at BAAP. WDNR staff will be in attendance and public comments will be accepted at this meeting.

Also, the groundwater monitoring plan modification approval contained a Notification of Appeal Rights. This notification provided for requests for a contested case hearing pursuant to section 227.42, Wisconsin Statutes for the modification approval. However, the time frame for requesting a contested case has passed at this point.

4. Do you know why the RAB members were not informed and did not have an opportunity to comment?

The modification to the groundwater monitoring program was not covered by the public participation requirements of Wisconsin Administrative Code NR 714. However the RAB members were informed about the WDNR approval of the modification request in an email from Debra K. Fawcett on September 16, 2013.

5. For 20 years, we had regular RAB meetings with agendas, presentations, and opportunities for open discussion but this has ended. For a while we received written updates from the Army but even this has been discontinued. Will the EPA support the restoration of board meetings?

In a letter dated February 7, 2013, to RAB members, the Army stated that due to the limited number of remediation decisions remaining in the BAAP environmental restoration program, and the goal of opening up input into the decision-making process to a more representative cross-section of the impacted community, the Army, in conjunction with WDNR and the EPA, has determined that in the future public meetings will be held on an as needed-basis to accommodate any remaining remediation decisions. The letter states, "At these future meetings, information regarding restoration activities will be presented to existing RAB members together with the public at large, and both RAB members and the public will have an equal opportunity to ask questions and offer comments in an open-house style environment. In addition, meetings may also be held by Army, by WDNR, or jointly to discuss other activities that have an impact on the surrounding community or to update the public on remedies already in place which require monitoring."

EPA notes that the following public participation activities associated with BAAP have taken place in 2013:

- February 7 - March 11, 2013 – Public comment period on the Alternative Feasibility Report for the Settling Ponds.
- February 20, 2013 – Public information meeting on the Alternative Feasibility Report for the Settling Ponds.
- June 18, 2013 – Public notice of Final Creek settling ponds and spoils disposal area remedy selection.
- June 26, 2013 - Public information meeting on Final Creek settling ponds and spoils disposal area remedy selection.
- July 15 - August 30, 2013 – BAAP Master Plan comment period.
- July 31, 2013 – Public information meeting on BAAP Master Plan.
- November 8, 2013 – Response to public comments on BAAP Master Plan posted.

EPA believes that WDNR is providing adequate public participation that is consistent with what EPA would provide for an EPA lead site. In addition, the Army will be holding a public meeting on December 11, 2013 to provide an update on corrective action activities (including groundwater) at BAAP. WDNR staff will be in attendance, and public comments will be accepted at this meeting.

Feel free to contact me at (312) 886-0455 or [rudloff.gregory@epa.gov](mailto:rudloff.gregory@epa.gov) if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory A. Rudloff", written in a cursive style with a long horizontal flourish extending to the right.

Gregory A. Rudloff,  
Corrective Action Section 1



DIVISION OF PUBLIC HEALTH

1 WEST WILSON STREET  
P O BOX 2659  
MADISON WI 53701-2659

Scott Walker  
Governor

Kitty Rhoades  
Secretary

**State of Wisconsin**

Department of Health Services

608-266-1251  
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dhs.wisconsin.gov

November 26, 2013

Honorable Fred Clark  
Member of Wisconsin State Legislature  
9 North, State Capitol  
P.O. Box 8952  
Madison, WI 53708-8952

Dear Representative Clark:

Thank you for your inquiry into the determination of soil cleanup levels deemed protective of all citizens who may visit the site of the former Badger Army Ammunition Plant (BAAP) for future recreational purposes. The Department of Natural Resources (DNR) has regulatory oversight of the cleanup and reuse of the former BAAP site, but has solicited input from the Department of Health Services (DHS) at many steps along the way to ensure the protection of public health, both on-site and off-site. DHS has also been invited to attend numerous public meetings to address the public health concerns of individuals living near the former BAAP site and explain the underlying rationale behind our determinations and recommendations.

The master planning process for the former BAAP site is still ongoing and no final determinations have been made regarding future uses. At this stage, soil remediation goals have been based on conservative, but realistic, recreational and occupational exposure scenarios. DHS will continue to work closely with DNR to evaluate potential uses and ensure the protection of public health. Included with this letter are our responses to your questions. Please contact me if you have additional questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen D. McKeown".

Karen D. McKeown, RN, MSN  
Administrator  
Division of Public Health

Attachment



DIVISION OF PUBLIC HEALTH

Scott Walker  
Governor

1 WEST WILSON STREET  
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Secretary

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November 26, 2013

Honorable Jon Erpenbach  
Wisconsin State Senate  
104 South, State Capitol  
P.O. Box 7882  
Madison, WI 53707-7882

Dear Senator Erpenbach:

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The master planning process for the former BAAP site is still ongoing and no final determinations have been made regarding future uses. At this stage, soil remediation goals have been based on conservative, but realistic, recreational and occupational exposure scenarios. DHS will continue to work closely with DNR to evaluate potential uses and ensure the protection of public health. Included with this letter are our responses to your questions. Please contact me if you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen D. McKeown".

Karen D. McKeown, RN, MSN  
Administrator  
Division of Public Health

Attachment

**Attachment: Department of Health Services, Division of Public Health  
response to questions on the former Badger Army Ammunition Plant  
posed by Representative Fred Clark and Senator Jon Erpenbach  
November 21, 2013.**

Q1. What are the specific assumptions about land use (i.e., types of activities and duration) and site conditions (i.e., vegetation, snow cover, etc.) for the default industrial USEPA RSLs (Composite Worker)?

*A1. US EPA's composite worker soil land use equation for the derivation of default screening levels does not address specific activities, but is based on default exposure parameters and factors that represent Reasonable Maximum Exposure (RME) conditions for long-term chronic exposures and assumes exposure from the following routes: incidental ingestion of soil, inhalation of particulates emitted from soil and dermal exposure. The default equations do not take into account percent of vegetative or snow cover, but these variables were incorporated for site-specific calculations. For composite workers, the US EPA assumes an exposure duration of 25 years, an exposure frequency of 250 days per year and an exposure time of 8 hours per day.*

Q2. What were the specific assumptions about land use (i.e., types of activities and duration) and site conditions (i.e., vegetation, snow cover, etc.) applied at the Final Creek, Settling Ponds and Spoils Disposal Areas for recreational soil remediation goals (Site-Specific Residual Contaminant Levels or SSRCLs)?

*A2. A conservative estimate of 50% vegetative cover was used for the calculation of site-specific residual contaminant levels (SSRCLs) at the Final Creek, Settling Ponds and Spoils Disposal Areas. Additionally, the default recreator exposure frequency of 75 days per year and estimated worker exposure frequency of 83 days per year were reduced by 33% based on historical weather data indicating that the ground at this site is frozen and/or snow-covered approximately 4 months per year. Specific land use activities were not addressed, but SSRCLs were based on default exposure parameters and factors that represent RME conditions for long-term chronic exposures, as well as human health toxicity values likely to be without appreciable risk of deleterious effects (cancer and non-cancer) during a lifetime of exposure for the human population (including sensitive subgroups).*

Q3. How is a Composite Worker defined and how do assumed activities and exposures for industrial USEPA RSLs compare to those assumed for a prairie restoration worker such as soil cultivation, invasive species removal, digging and planting, etc.?

*A3. The US EPA defines a composite worker as "a long-term receptor exposed during the work day who is a full time employee working on-site and who spends most of the workday conducting maintenance activities outdoors. The activities for this receptor (e.g., moderate digging, landscaping) typically involve on-site exposures to surface soils. The composite worker is expected to have an elevated*

*soil ingestion rate (100 mg per day) and is assumed to be exposed to contaminants via the following pathways: incidental ingestion of soil, external radiation from contaminants in soil, inhalation of fugitive dust. The composite worker combines the most protective exposure assumptions of the outdoor and indoor workers. The only difference between the outdoor worker and the composite worker is that the composite worker uses the more protective exposure frequency of 250 days/year from the indoor worker scenario." It is assumed that a prairie restoration worker would engage in similar activities, but with a significantly reduced exposure frequency.*

Q4. Were default industrial USEPA RSLs for a Composite Worker adjusted to be inclusive of infants, children and pregnant mothers? If not, what assurance does the public have that these levels are protective of these populations?

*A4. All US EPA RSLs are based on the use of human health toxicity values likely to be without appreciable risk of deleterious effects (cancer and non-cancer) during a lifetime of exposure for the human population (including sensitive subgroups).*

Q5. Please provide the default "industrial" soil remediation goals (US EPA RSLs) for the 2,4-/2,6-DNT mixture, 2,4-DNT (single isomer) and 2,6-DNT (single isomer). Please compare each to the soil remediation goals based on recreational use.

*A5. The US EPA states that RSLs "are chemical-specific concentrations for individual contaminants in air, drinking water and soil that may warrant further investigation or site cleanup. **It should be emphasized that SLs are not cleanup standards.**" Thus, the relevance of this question to the cleanup activities at the former Badger Army Ammunition Plant (BAAP) is unclear.*

*Only technical grade DNT (tgDNT) was used at the former BAAP, which predominantly comprises 2,4-DNT and 2,6-DNT (~95%), along with small amounts of four other minor isomers (~5%). There are no appropriate peer-reviewed studies available to derive a suitable chronic human health toxicity value for tgDNT. Thus, the most appropriate toxicity value available for use in calculating a soil remediation goal at the former BAAP is for a 2,4-/2,6-DNT mixture. The SSRCL calculated for a 2,4-/2,6-DNT mixture, based on estimated child and adult exposures at BAAP was 11.4 mg/kg.*

Q6. Using the EPA web calculator, please calculate the default "industrial" USEPA RSL for "Dinitrotoluene, Technical Grade" (CASRN 25321-14-6) which is a mixture of all six isomers of DNT.

*A6. The US EPA web calculator does not calculate RSLs, however, it can be used to calculate SSRCLs. With that said, the calculation of an SSRCL for tgDNT is inappropriate based on the lack of a suitable chronic human health toxicity value for this specific mixture. The human health toxicity values available for tgDNT are unsuitable for calculation of an SSRCL because they are based on a single*

*unpublished study, and are considered by US EPA to be Tier 5 toxicity values that have considerable uncertainty associated with their derivation.*

Q7. Using the EPA web calculator, please calculate the default "recreator" USEPA RSL for "Dinitrotoluene, Technical Grade" (CASRN 25321-14-6).

*A7. Please see A6.*

Q8. Please calculate the site-specific soil remediation goal (SSRCL) for "Dinitrotoluene, Technical Grade" (CASRN 25321-14-6) for the Final Creek, Settling Ponds and Spoils Disposal Areas.

*A8. Please see A6.*

Q9. USEPA RSLs are calculated under the assumption that only one contaminant is present, however multiple contaminants, including those in similar categories, are present in soils at the Settling Ponds. How were the default USEPA RSLs adjusted in response to potential additive and cumulative risks? How were additive and cumulative risks included in the calculations of SSRCLs?

*A9. Cumulative risk assessments of human exposures to chemical mixtures are extremely complex and challenging. Individual chemicals target different tissues and have different mechanisms of toxicity and/or carcinogenicity. Additionally, chemicals do not always behave the same in mixtures as they do individually, and there is little toxicological research on chemical mixtures with which to inform these types of risk assessments. Lastly, the former BAAP consists of thousands of acres of land, and any mixtures of residual chemicals of concern are not uniformly present across the site, making a rigorous cumulative risk assessment unfeasible. With that said, the levels of any residual contaminants of concern in surficial soils (0-4 feet) across the majority of the former BAAP site are currently below levels of laboratory detection, and cleanup levels for individual chemicals are based on conservative exposure assumptions and human toxicity values that often incorporate considerable margins of safety.*

Q10. The Alternative Feasibility Study for the Final Creek, Settling Ponds and Spoils Disposal Areas at Badger states that certain contaminants, such as carcinogenic polyaromatic hydrocarbons (PAHs) and arsenic (As), are not considered "pervasive" in soils meaning that they have been detected in certain areas, but not others. How will the public know where areas with elevated contaminant levels are located? From a human health perspective, would it be better if future fixed or repetitive recreational activities (that could disturb soils) are not sited in these locations?

*A10. Out of over a thousand soil samples that have been analyzed from across the Final Creek, Settling Ponds and Spoils Disposal Areas at the former BAAP site, only one sample (SPB-91-01) contained the carcinogenic PAHs benzo(a)anthracene and benzo(b)fluoranthene above their residential US EPA RSLs. Similarly, only one soil sample (SPA-W-33) contained arsenic above the BAAP background concentration. Thus, these contaminants are not pervasive enough to pose a human health concern, regardless of recreational activity.*

*The sample locations noted above can be found in Figure 9 of the Alternative Feasibility Study for the Final Creek, Settling Ponds and Spoils Disposal Areas.*

Q11. Asbestos has been released to the Final Creek, Settling Ponds and Spoils Disposal Areas at Badger. Asbestos monitoring results from 2007 to 2012 for the Bluffview sanitary system document 6 limit exceedance violations for asbestos, two of which WDNR said were significant. The wastewater treatment plant, now owned and operated by the Bluffview Sanitary District, was issued a WPDES permit effective July 1, 2012. This permit continues the requirement for monthly asbestos monitoring in the effluent to the seepage cells previously contained in the Badger permit. The WPDES permit also added asbestos to the list of parameters for the quarterly groundwater monitoring requirements, beginning in the July-September 2012 quarter.

What are the possible health risks associated with exposure to asbestos? How can asbestos fibers in soil become airborne? Can asbestos that is not visible to the naked eye pose a risk to human health? If asbestos fibers have been discharged to the land via wastewater and/or stormwater, in terms of public health would it be a good idea to test affected soils?

*A11. The primary health risks associated with exposure to asbestos are lung scarring (i.e., asbestosis) and lung cancers. These health effects typically develop in workers exposed to asbestos, but not in the general public, as they require years of chronic exposure. Asbestos fibers could become airborne if soils containing asbestos are disturbed, but asbestos fibers are not able to move through soil.*

*Soil testing would be indicated if there was reason to believe that soils were contaminated and would be disturbed by human activity in the future. However, according to the DNR in a letter to Citizens for Safe Water Around Badger, dated September 5, 2012, "the Army and its Contractors have complied with all site asbestos cleanup requirements (and to my knowledge, other media program requirements as well). Surface soil has been removed from near some of the buildings due to paint chip and other contamination, and the removed soil has been appropriately land filled."*