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Subject: BADGER ARMY AMMO PLANT - CSWAB

THE SITUATION AT THE BADGER ARMY AMMUNITION PLANT

The following is the written version of a presentation made on May 1, 1995 by Laura Olah, Executive Director of Citizens for Safe Water Around Badger (CSWAB) to a community meeting about the Twin Cities Army Ammunition Plant sponsored by Minnesota Jobs with Peace.

I live near the Badger Army Ammunition Plant, which is located about a hour's drive northwest of Madison, Wisconsin. The 7,000-acre facility was constructed in 1942 to produce propellant for cannot, rocket, and small arms ammunition. Not unlike the Twin Cities plant, waste products that resulted from the production include metals (like lead, chromium, and cadmium), solvents (carbon tetrachloride and trichloroethylene) and nitrocellulose, a key component of explosives. Production occurred during World War II, the Korean conflict, and the Vietnam conflict. The Badger plant stopped production in 1975 and has been inactive since then. Olin Corporation, the current operating contractor, employs 150 people and their are 6 Army personnel on site.

Past disposal practices have heavily contaminated surface and subsurface soil on Badger property. Over the years contaminants migrated to the water table, creating a plume to toxic groundwater. On May 9, 1990 the Army reported that drinking water wells serving three homes south of the Badger plant had been polluted with unsafe levels of carbon tetrachloride and chloroform. The well of the home of Ken Lins, close to the plant's southern border, contained the highest levels of chemicals. The concentration of carbon tetrachloride was measured at 80 parts per billion - more than 13 times the State's recommended safe standard of six parts per billion. The Army estimates these people drank unsafe water for at least 15 years.

The plume of contaminated groundwater continues south to within a quarter mile of Prairie du Sac's municipal well which serves

the village's 3,000 residents and has reached the Wisconsin River. Subsequent testing revealed eight of over one hundred private wells in this area were contaminated with these compounds and, of these, four are above state groundwater standards. According to the Agency for Toxic Substances and Disease Registry, a federal health bureau, exposure to these chemicals is known to induce liver, kidney, and lung cancers.

Community members joined together and gained quarterly testing for 32 private wells, organized public meetings and began publishing a newsletter. And this was the beginning of our organization - Citizens for Safe Water Around Badger, or CSWAB. In 1993, CSWAB successfully blocked the Army's proposal to increase open burning of waste propellant - a practice that disperses contaminated ash to the air and pollutes surrounding soils. Construction of a \$425 million facility (SMES) - capable of producing dangerous levels of electromagnetic radiation - has been postponed. In 1994 CSWAB leveraged an unprecedented recommendation from the Wisconsin Division of Health expanding environmental testing at the Badger plant, ensuring private drinking wells were adequately protected.

CSWAB's recent search through State files exposed a conspiracy between regulators and the Army to cover up laboratory errors. The State Department of Justice has initiated an investigation of the incident. The laboratory errors potentially compromise the integrity of a \$6 million environmental study and the safety of nearby drinking water wells.

We serve the rural communities surrounding the plant, a population of approximately 15,000; constituents are principally rural, working class people. The board consists of four women and one man; one professional, one retired, on farmer, one homemaker, and one salesperson. The drinking water wells of two board members have been impacted by toxins from the local Army facility; and we all live near the Badger plant. Our board is entirely volunteer; and I am the only hired staff.

Our goal is to secure citizen participation in decisions regarding the Badger Army Ammunition Plant. Historically, the plant workers and community have been excluded from this process and as a result, public health and the environment have been damaged. A 1990 study by the Wisconsin Division of Health confirmed that communities near the Badger plant have a significantly higher incidence of cancer deaths. The incidence of non-Hodgkin's

lymphoma and kidney/ureter cancer deaths are 50% higher than the balance of the state. Workers and residents have been exposed to unsafe levels of air emissions from chemical spills and hazardous disposal practices. Of the 40 contaminated military sites in Wisconsin, the Defense Environmental Restoration agency has cited Badger as the most polluted.

Unfortunately, my community's experience with military toxics is not unique. If you live near the Twin Cities Army Ammunition Plant, you know first hand about the impacts military pollution has on human health and the environment. Out of 32 contaminated military facilities in Minnesota, Twin Cities has the second highest number of sources of pollution. (Fort Snelling is ranked first.)

For too many years, the military has been able to use "national security" as an excuse for lying to the public. They simply have not been held accountable, and we are the ones that have paid the price. Clearly, public awareness and involvement are critical to assure that communities know the extent of local pollution, facilities are adequately cleaned up, disposal methods are safe, and new military or civilian industry is pollution-prevention oriented to protect

the environment and human health.

It was for these reasons that in late 1993, CSWAB petitioned the Department of Defense for the establishment of a citizens advisory board; of the nation's nearly 1,855 contaminated military sites, Badger was one of the five pilot sites. There were 15 sites in all

designated by the Army, Navy, and Air Force. The intent of the Restoration Advisory Boards, or RABs as they're called, was to give those people who are directly affected by cleanup activities, the stakeholders, a greater role in the cleanup decision-making process. Examples of stakeholders include nearby residents, local citizens, environmental and public interest groups, workers, and Native American and indigenous peoples.

The Keystone report, the guidance document for this process, recommends "special efforts should be made to provide notice and opportunity to participate for people who are or have historically been disproportionately impacted by site contamination." Moreover, the Keystone report recommended that the EPA, through an open and democratic process, lead the RAB membership selection process.

Although leadership within the Department of Defense had agreed to the principles of the Keystone report, the local Commander's representative ignored this directive and hand-picked the membership. I was told, first-hand, by one of the members, "I told Dave (the Commander's rep) that as much as I liked playing racquetball with him, I really didn't want to be on this board." So now you have some idea who was on the board.

Now let me tell you who wasn't on the board. The people with bad wells. Note one of the families that had wells contaminated by pollution from the plan was invited to serve on the committee. I'll remind you of the intent of the RAB, which was to involve people "disproportionately impacted by site contamination."

So, my first recommendation to your community is that you insist the local command honor the recommendations of the Keystone report. The success of your local group will depend a great deal on its foundation, which is a membership selection process that is open and democratic, and a membership that is diverse and representative of all stakeholders.

Second, the Army will probably insist that your RAB have both a community co-chair and an Army co-chair. I think you can make that work to your advantage. If the Army is a participant in the decision-making process, then I believe the recommendations that come of our your committee will have a greater chance of being implemented.

Third, I would work very hard to get funding for technical assistance monies. Like it or not, the RAB members will be called on to make recommendations on highly technical issues. Even if I was a hydrogeologist, I don't have expertise in air toxics, RCRA law, epidemiology... well you get the idea.

Our RAB, however, despite its rocky start, has effectively influenced some specific proposals. For instance, a proposal for soil incineration for cleanup of explosives contaminated soils has been blocked. The Army is now in the process of conducting treatability studies for alternative, safer technologies.

In closing, I can't emphasize enough how important it is for you to participate in the public decision-making process.

For generations, we have trusted the military and the regulators to protect our environment and our families. And look

where we are.

You have a right to know, you have a right to participate, and you have a right to have a clean, safe environment for yourselves and your children.

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