

**United States Environmental Protection Agency
Region 5**

Mr. Kiel R. Jenkin
Project Manager, Wausau NPL Superfund Site
GHD
1801 Old Highway 8 NW Suite 114
St. Paul, MN 55112 USA
Kiel.Jenkin@ghd.com
Via email

August 2, 2021

RE: Conditional Approval and Final Comments Regarding the Conceptual Plan Letter (the Plan) for Modifications to the Wausau Drinking Water Treatment Facility (DWTF); Wausau Groundwater Contamination National Priorities List Superfund Site (Wausau NPL Superfund Site)

Dear Mr. Jenkin,

The United States Environmental Protection Agency (EPA) and the Wisconsin Department of Natural Resources (WDNR) hereby provide conditional approval of the Plan for the Wausau NPL Superfund Site pending submission of the information and clarifications requested in the final comments in the enclosure to this letter.

The Plan was submitted on January 2, 2020, and discussed in multiple subsequent meetings. In addition, EPA provided draft comments regarding the Plan in June 2021 which were also discussed at several meetings.

The submitted Plan summarizes that the City of Wausau is required to make infrastructure changes to the DWTF due to its age and severe deficiencies. The City of Wausau is building a new plant on the west side of the Wisconsin River and taking the existing plant off-line on the east side of the River. The new DWTF will include air strippers to address the residual groundwater contamination from wells located on the west side of the River. However, the water from CW-3 will no longer be treated and will instead be diverted and discharged to a storm sewer and then ultimately to the Wisconsin River (rather than into the municipal water system). The Plan states that given the very low concentrations of Site contaminants in the CW-3 influent, continued treatment, via air stripping, is not needed.

The Plan needs approval by EPA and WDNR because City Well #3 (CW-3) and the existing treatment plant with the air strippers have been an integral part of the NPL Superfund remedy. Since CW-3 is a component of the remedy for the Wausau NPL Site, the City and the potentially responsible parties have requested guidance and assistance from the EPA and DNR regarding this situation.

EPA and WDNR agree that samples taken from EW-3 are and have consistently been below the EPA's federal drinking water standards (i.e., Maximum Contaminant Levels (MCLs)) and WDNR's Enforcement Standards (ESs). Thus, treatment of water from the CW-3 would no longer be required as long as the rate of extraction will remain unchanged and the discharge to the Wisconsin River will comply with permit discharge limits that would apply for any permit issued by the WDNR.

Included in the enclosure to this letter, EPA and WDNR provide final comments to the Plan. Please provide responses to comments and a revised Plan addressing those comments within forty-five (45) days of receipt of this letter.

If you have any questions or require clarification, please contact me.

Sincerely,

Sheri L. Bianchin

Sheri L. Bianchin
Remedial Project Manager

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cc: Scott Boers, City of Wausau
Mathew A. Thompson, WDNR
Steven Kaiser, EPA

ENCLOSURE

Final Comments to the Conceptual Plan for Modifications to the Wausau Drinking Water Treatment Facility (DWTF)

1. EPA and WDNR's understanding of the Plan is as follows: The Plan involves the City building a new treatment facility at a different location at the west side of the River with air stripping treatment to address the groundwater contamination from the water extracted from CW-6. Removing this well from the potable system would eliminate the need to convey raw water across the river to the new treatment facility.

The City will continue to pump and withdraw the groundwater from the east side of the River in order to maintain the cone of depression and capture of the contamination plume. The pumping rate will be maintained to meet the EPA-recommended volume of 4,680,000 gallons per week.

However, the water from CW-3 will no longer be treated and will instead be diverted and discharged to a storm sewer and then ultimately to the Wisconsin River rather than into the municipal water system. This discharge will meet any permit requirements from the WDNR. The VOC concentrations detected in samples taken from CW-3 are below the federal MCLs and WDNR's ESs.

Please confirm that the information is correct. Further elaborate on the permitting process for the proposed discharge to the River. Describe further the air strippers that will be part of the new DWTF and how the design will be able to treat the extracted water from CW-6. Last, describe whether any modifications to the pumping rates or frequency of CW-6 are anticipated.

2. The letter described CW-3 as having 58-year-old equipment and it is also difficult to maintain. While CW-3 will no longer be needed to supply drinking water, this well is needed to remain operational to divert the residual contaminants in wells with higher concentrations from entering the river system naturally. Therefore, a plan should be made to rehabilitate or upgrade the CW-3 well components to ensure it remains effective in pumping the requisite volume of water.
3. Provide more detail regarding what will happen to the pumped water extracted from CW-3 and how the work will be accomplished and provide plans and specifications.
4. The Plan should provide additional details as to whether the sewer pipes and reducers have the capacity to handle the volume of required effluent both in normal times and during storm and flood events.

5. The Plan should state whether sampling of the extracted water from CW-3 is proposed to remain on the current sampling plan schedule and whether modifications will be proposed to the existing sampling plan and reporting procedures including the discharge of water to the River. Provide additional justifications regarding how the sampling plan and reporting procedures will demonstrate continued protectiveness to human health and the environment.
6. The Plan should state whether sampling of the extracted water from CW-6 is proposed to remain on the current sampling plan schedule and whether modifications will be proposed to the existing sampling plan and reporting procedures. Provide justifications regarding how the sampling plan and reporting procedures will demonstrate continued protectiveness to human health and the environment.
7. Describe how likely an unforeseen circumstance may arise and levels of VOCs in the groundwater rise in CW-3 and describe what the contingency measures would be in such a scenario.
8. Include a provision to provide regular reports to EPA and WDNR regarding the water discharge permitting process and the work done to convert from the existing treatment plant to the new treatment plant.
9. Explain in more detail the trend of contamination found in the groundwater on the east side of the Wisconsin River and why air strippers are no longer needed as part of the treatment system from CW-3 including an analysis of the levels of contamination from EW-3 since the inception of the remedy for the Site. Explain what will happen to the existing air strippers. Explain further what will happen to the pumped water from CW-3.
10. Include a provision to provide regular reports to EPA and regarding the attempts to NPDES and the work done to convert from the existing treatment plant to the new treatment plant. Provide to provision in the Plan for EPA and WDNR to receive continued documentation that the discharge is in compliance with the permit and/or effluent standards set by the WDNR.
11. Provide an updated schedule.