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**PFAS Scoping Statement**  
Wausau Water Supply NPL Site  
Wausau, Wisconsin

Dear Ms. Bianchin and Mr. Thompson:

On August 17, 2020, the Wisconsin Department of Natural Resources (WDNR) sent the Group a copy of a letter that was sent to all Responsible Parties (RPs) that had an open contamination Site in the WDNR's Bureau for Remediation and Redevelopment Tracking System (BRRTS). As stated in the letter, the purpose of the letter "...is to remind RPs to assess emerging contaminants and their potential impacts as early in the cleanup process as possible, preferably during the site investigation phase. Emerging contaminants include perfluoroalkyl and polyfluoroalkyl substances (PFAS), 1,4-dioxane and others..."

In GHD's monthly calls with the WDNR and the United States Environmental Protection Agency (USEPA), both agencies have reiterated the request of a PFAS scoping statement evaluation at the Site. The purpose of this letter is to fulfill this request as related to PFAS chemicals.

## **1. Background Information**

In June 2019, and again in January 2022, the City of Wausau (City) voluntarily sampled the City well field for the presence of PFAS chemicals. Total PFOS and PFOA combined concentrations within the well field ranged from 18 to 35.3 parts per trillion (ppt). The City proactively created a PFAS information portal on the publicly accessible portion of its website to keep the community informed on the status of PFAS in the City well field.

## **2. Potential Sources**

In ongoing monthly meetings between GHD, the EPA, and WDNR, the agencies requested a review of potential sources of PFAS as related to the Superfund Site. Upon internal document review and investigation of potential historical sources, GHD in cooperation with Wausau Chemical, Regal-Rexnord, and the City have determined that no known source of PFAS chemicals exists at the Site as related to the RPs.

The RPs acknowledge the former landfill, located on Regal-Rexnord property as a potential source of contamination as it is the known source of the chlorinated volatile organic compound (CVOC) contamination on the West Bank portion of the Site.

### 3. Discussion

PFAS results from voluntary sampling events conducted by the City in 2019 and 2022 indicated widespread, uniform distribution of PFAS concentrations throughout the well field. PFAS concentrations at wells north and northwest of City Well (CW) #6 on the West Bank have similar concentrations to those identified in CW6 which acts as a hydraulic control of former landfill contaminants on the West Bank. These concentration distributions strongly suggest that the landfill is not an ongoing source of PFAS contamination at the Site because the contamination extent exceeds the extent expected by the known hydraulic conditions that exist on the West Bank. Similar concentrations of PFAS chemicals identified in samples collected from CW3 on the East Bank further strengthen this assertion as the West and East Bank portions of the aquifer are not hydraulically connected due to ongoing pumping activities at the Site.

### 4. Path Forward

GHD and the RPs do not believe further investigative evaluation of PFAS chemical sources at the Site at this time is warranted, including sampling of the Site's monitoring well network. The RPs will continue to seek WDNR and EPA guidance on this issue.

Please contact me if you need any additional information.

Regards,



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