



REGION 5

CHICAGO, IL 60604

January 5, 2024

Mr. OJ Ojinaga
Project Manager
GHD
900 Long Lake Road, Suite 200
St. Paul, Minnesota 55112

Re: EPA request for additional data and information relating to the Wausau Groundwater Contamination Superfund Site

Dear Mr. Ojinaga:

The U. S. Environmental Protection Agency (EPA) requests that the Settling Defendants¹ identified in the Consent Decree entered in 1991 provide additional data and information to ensure the short-term and long-term protectiveness of the current remedy at the Wausau Groundwater Containment Superfund Site (Site). EPA has elected to make these requests following a review of both historic and contemporary groundwater, soil, and vapor intrusion data. EPA expects that implementing the requests will improve the remedy's cleanup efficiency (time and cost), accelerate the Site's closure, and increase the Site's availability for anticipated use and redevelopment.

1. West Bank VI Sampling – Previous and contemporary vapor intrusion (VI) sampling on the west bank of the Wisconsin River at “Marathon Electric Building A” (Building A) and “Marathon Electric Building B” (Building B) has produced evidence that chlorinated volatile organic compound (CVOC) sub-slab vapor concentrations have increased significantly and steadily between 2017 and 2023. Moreover, the current sub-slab vapor concentrations for trichloroethene (TCE) in at least one location of each building are 10 times greater than the vapor intrusion screening levels (VISLs) for the Site (880 micrograms per cubic meter). In Building A, CVOC sub-slab vapor concentrations increase towards an enclosed laboratory space where employees may be exposed for hours-long periods of time. EPA requests the Settling Defendants sample indoor air in the Building A laboratory and any offices where an employee works for a hours-long period of time. EPA also requests the Settling Defendants sample sub-slab vapor beneath the offices and other areas deemed necessary by EPA to delineate the extent of sub-slab vapor exceedances and ensure the Site remedy is protective of human

¹ The Settling Defendants identified in the 1991 Consent Decree are the following: City of Wausau, Marthon Electric Manufacturing Corporation, Wausau Chemical Corporation, and James E. Cherwinka.

health. The west bank sampling must take place between January and February to capture seasonal (winter) affects. The precise sampling locations should be determined no later than January 31, 2024, following discussions with EPA and a site visit by EPA and Wisconsin Department of Natural Resources (WDNR).

2. East Bank VI Sampling – Sub-slab vapor sampling on the east bank has generally identified concentrations of CVOCs that do not exceed Site VISLs. However, one building, Thrive Foodery, is located directly above the CVOC groundwater plume. Sub-slab vapor and indoor air have not been sampled at this location despite extended human occupancy within the building. EPA requests the Settling Defendants sample sub-slab vapor and indoor air at Thrive Foodery on the east bank to ensure the remedy is protective of human health. EPA can assist with building access if this is, or has been, an issue. The east bank sampling must take place between January and February to capture seasonal (winter) affects. The precise sampling location(s) should be determined no later than January 31, 2024, following discussions with EPA and a site visit by EPA and/or WDNR.
3. West Bank VI Source Identification and Action – According to the Region 5 Vapor Intrusion Handbook, pre-emptive VI mitigation is warranted if sub-slab vapor concentrations exceed Removal Management Levels (RMLs), which are a 10^{-4} cancer risk and a hazard index of 3 or a hazard index of 1 in the case of TCE, even if indoor air concentrations are below VISLs. The sub-slab vapor concentrations of TCE at both Building A and Building B exceed a hazard index of 1. Moreover, the sub-slab concentrations of TCE at Building B have increased significantly over the last six years, indicating a significant and currently undefined source of TCE. EPA requests the Settling Defendants identify potential sources in groundwater and/or soil leading to continued and increasing VI. This will likely involve performing sub-slab, soil gas, and soil sampling in west bank locations where historical activities may have resulted in significant "hot spots" of TCE contamination. The locations of possible historical activities are approximated in a diagram provided by EPA and attached to this letter. The final sampling locations will be detailed in a vapor and soil sampling work plan submitted to EPA no later than May 1, 2024. Pending the collection and review of these additional data, additional action (e.g., VI mitigation or source control) may be required to address VI at this area of the Site.
4. Groundwater Treatment Remedy Information– Significant changes to the groundwater treatment remedy were made when the City of Wausau constructed a new water treatment facility that includes anion exchange resins and, in the near future, granular activated carbon water treatment steps along with the remedy-required air stripping. The technical details of this new facility have not been shared with EPA. EPA requests the Settling Defendants provide a document that describes the current and planned operational details for the new city water treatment facility no later than January 31, 2024.
5. Emerging Contaminant Information – Perfluorinated alkyl substances, such as perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS), are known pollutants/contaminants that are reportedly intermixed with Site contaminants of concern (COCs) in groundwater and at the remedy's treatment facility. EPA requests the Settling Defendants provide to EPA by no later than January 31, 2024, all previously gathered PFAS sampling data and reports for all municipal wells, nearby groundwater, treatment facility

influent and effluent, residential drinking water, soils, and any other nearby media that might provide information relating to the ability of a person to perform a cleanup of PFAS at the Site. If no data and reports are identified beyond the two sent to EPA on January 4th 2024, then Settling Defendants will inform EPA that none were identified.

6. Methane Gas Information – To EPA’s knowledge, the former city landfill on the west bank has not been sampled for methane and currently possesses no infrastructure for methane venting. EPA requests the Settling Defendants prepare a work plan to test and assess the west bank area at and surrounding the landfill for methane gas no later than February 29, 2024 to be able to address risks posed to human health or the environment.
7. East Bank Redevelopment – EPA has recently learned that the City of Wausau hopes to eventually redevelop the Site’s east bank, perhaps for residential use. EPA plans to work closely with the City, Settling Defendants, WDNR, and any other parties to ensure this change in anticipated use does not interfere with the remedy or lead to an unacceptable risk to human health or the environment. To this end, EPA requests the Settling Defendants keep EPA and WDNR informed of meetings or planning processes where specific remediation or redevelopment plans are being made for the Site. Involving EPA and WDNR during initial planning phases will help in the design of institutional controls (ICs) for the Site. The ICs must be fully protective of human health and the environment while allowing flexibility and contingencies for safe redevelopment and anticipated use. If substantial remediation activities take place, these remediation activities may eliminate the need for certain ICs.

EPA expects to work closely with your team in the coming weeks to plan and carry out the actions identified in items 1-6. If anyone has questions, comments, or concerns related to the above-described requests or would like more information about the data/reports from which EPA draws its conclusions, please contact me at 312-353-1526 or dewey.jeffrey@epa.gov. Please note that EPA Project Manager Sheri Bianchin has retired. All future communications should be directed to my attention. I note further that the current Site attorney is Associate Regional Counsel Steven P. Kaiser. Mr. Kaiser may be reached at kaiser.steven@epa.gov.

Sincerely,

Jeffrey Dewey
Remedial Project Manager

cc: all cc recipients via email

Steven Kaiser – EPA, ORC
Matthew Thompson – WDNR
Jeffrey Paddock – WDNR
Ryan Aamot – GHD
Matthew Groves – GHD