



REGION 5

CHICAGO, IL 60604

February 2, 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) received your comments provided via email on January 31st, 2024. GHD's (your) responses 1, 2, 4, and 5 adequately addressed EPA's requests for additional sampling and information. However, your responses 3, 6, and 7 warrant follow up (see below).

GHD Response 3

The locations of possible historical activities in the diagram provided by EPA. Highlighted the following locations:

– North Building – Painting and Packaging

- This area will be addressed with the additional sub-slab and indoor samples (SS-13/IA-13) outlined in GHD Response 1*

– North Building – Drum Storage

- This area is listed as a potential step out area to be sampled based on the findings of the additional (SS-13/IA-13 and SS-14/IA-14) sub-slab and indoor samples as indicated in GHD Response 1*

– North Building – Varnish Drum Storage Area

- GHD has collected soil gas samples from this area. The soil gas probe W2S and W2D were sampled in March and August of 2017, and the analytical results were below the Large Industrial Screening Level for the COC on the West Bank.*

– South Building – Eastern side of the building

- *This area overlies the former landfill area. Further exploratory investigations into this area are not recommended to minimize the disturbance of known waste. Due to the increasing sub-slab concentrations, GHD will continue to conduct sub-slab and indoor air monitoring at areas where sub-slab concentrations exceed the screening criteria to document current conditions and prevent potential exposure to workers at the facility.*

– *South Building – Former Hazardous Waste Storage Area*

- *Investigative work was done on the landfill as part of the initial site characterization outlined in the ROD. However, we do understand that there has been an increase in sub-slab vapor concentrations of TCE at both Building A and Building B, exceeding a hazard index of 1. We recommend combining the requested investigation activities with the Methane investigation request provided in GHD Response 6. Note that the investigation will only include the West Bank site-related chemicals of concern.*

EPA Follow up to GHD Response 3

3. EPA agrees that the winter VI sampling in the North Building described in Response 3 will help identify the general areas where source soils may remain and will help guide future sampling in that area.

For the Eastern side of the South Building, EPA understands the concerns regarding investigations into the landfill area. The following information hopefully assuages those concerns.

- First, intensive soil investigations that were also closer to the deepest vertical extent of the City landfill were successfully carried out during the 1989 Remedial Investigation.
- Second, the highlighted map from the 1989 RI that EPA sent with the letter dated 1/5/24 identifies the former sand and gravel pit excavation escarpment with a dashed line. This area is not near the eastern portion of the South Building where source soils are suspected. Given the gravel pit area’s description, it’s more likely to contain large quantities of waste compared to the area in question, which is only described as “limits of fill”. This description may indicate soil fill for purposes of grading or cover rather than actual waste fill.
- Third, the Eastern area of the South Building requires source identification and control given the sub-slab concentrations greatly exceed the hazard index of 1 for TCE and are increasing over time. It may be possible to delineate an approximate source area by ruling out non-landfill source areas, but this does not provide quantitative information that is necessary to make future decisions regarding source control.

Overall, source identification and control in the Eastern portion of the Southern Building remains important to the Site’s protectiveness. EPA is open to suggestions and recommendations to achieve identification and control without further exploratory investigations into the landfill area. EPA suggests we discuss this issue during the Site’s monthly call in February or sooner. This call should also include a discussion about uniform federal policy quality assurance project plans (UFP-QAPPs) for upcoming work, which should be addressed as soon as possible.

A work plan will be prepared to assess the landfill and surrounding areas for methane gas. We request that EPA grant an extension to April 1, 2024, for the submittal of this work plan.

EPA Follow up to GHD Response 6

6. EPA grants the extension to April 1, 2024 for a methane gas work plan. EPA also suggests we informally discuss components of the proposed work plan during the Site's monthly call in March to ensure the broad expectations of EPA, the State, and GHD are aligned prior to initial submission.

GHD Response 7

The City of Wausau and GHD will include EPA and WDNR in future meetings and the planning process related to specific remediation or redevelopment plans for the Site once the City has received funding/approval to move forward with this project.

EPA Follow up to GHD Response 7

EPA suggests GHD, the City Redevelopment team, the State, and other interested parties (e.g. Marathon County Department of Human Health or prospective redevelopers) have a meeting soon (i.e. in February) where EPA can present the general process for Superfund remediation and redevelopment and how that process applies to the Site's East Bank. EPA expects this meeting will greatly aid the City in developing plans that efficiently meet its goals while complying with Superfund requirements.

Please confirm by **February 12th, 2024**, that you, and the City for Follow up 7, agree to the above-suggested meeting dates and topics. If not, please send alternative dates to meet about the above topic. As always, feel free to reach out to Jeffrey Dewey by phone or email at 312-353-1526 and dewey.jeffrey@epa.gov respectively with any questions or comments.

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