

From: [Dewey, Jeffrey](#)
To: [Borski, Jennifer - DNR](#); [Hedman, Curtis J - DHS](#); [Paddock, Jeffrey J - DNR](#); [Thompson, Matthew A - DNR](#)
Cc: [Laura.Scudiere@co.marathon.wi.us](#); [Kate.Florek@co.marathon.wi.us](#); [Hoverman, Robert R - DNR \(Rob\)](#)
Subject: RE: Wausau Groundwater Contamination Superfund Site
Date: Friday, April 12, 2024 11:46:58 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

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Hi Jennifer,

Thanks for the follow up! I'll forward this resource to GHD and use it/keep it in mind as the situation develops.

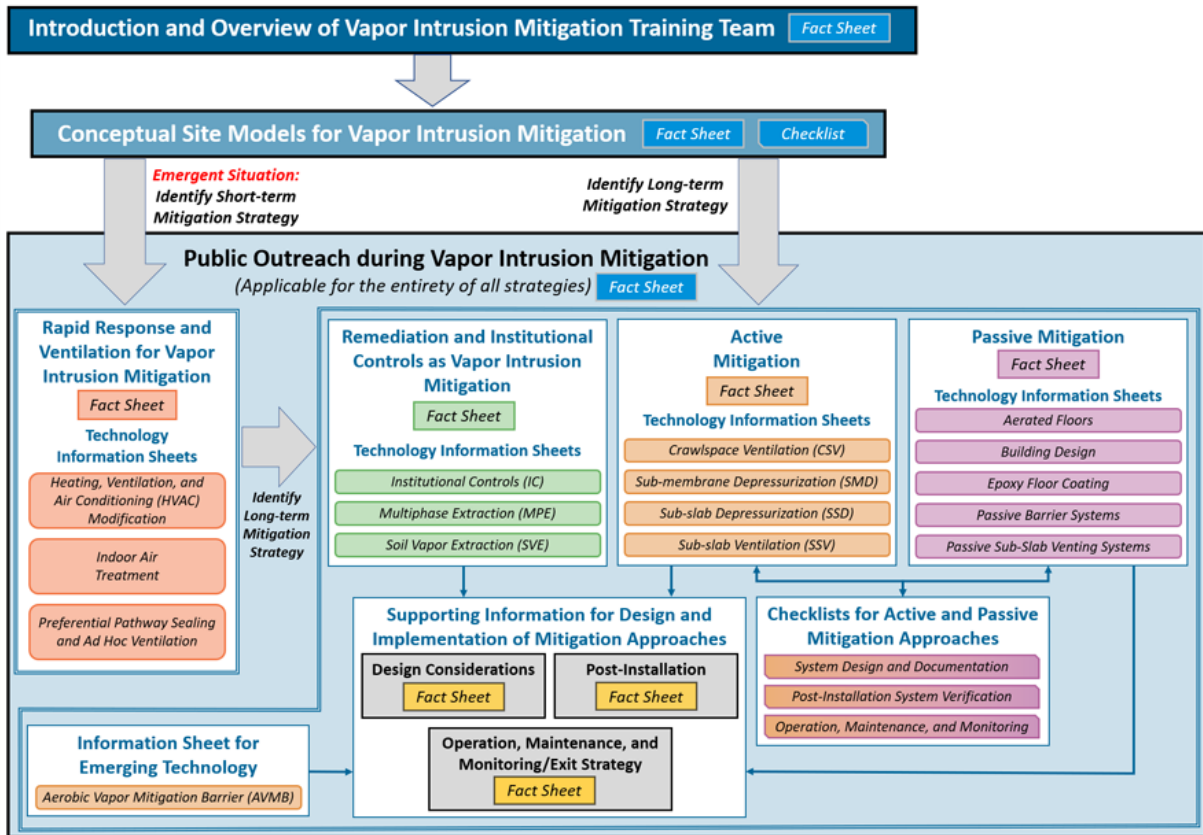
Best,
Jeff D.

From: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Sent: Friday, April 12, 2024 11:32 AM
To: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>; Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>
Cc: Laura.Scudiere@co.marathon.wi.us; Kate.Florek@co.marathon.wi.us; [Hoverman, Robert R - DNR \(Rob\)](mailto:robert.hoverman@wisconsin.gov) <robert.hoverman@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

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Hi all – Thanks for keeping me in the loop. After reading the info below, I recommend that Jeff D or Jeff P pass on to GHD a recommendation to review the resources on vapor intrusion mitigation by the Interstate Technology Regulatory Council (ITRC): [Interactive Directory for Vapor Intrusion Training Team Materials – vim \(itrcweb.org\)](#). This interactive website is a great resource as GHD evaluates the potential risk here and considers appropriate rapid responses for protection of public health and mitigation applications (could be a combination of options at this complex building).

Here's a screen shot of the interactive directory that is a great oversight of all materials available (fact sheets & technology sheets) – note links do not work in the screen shot but the link above will take you to this page:



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Jennifer Borski

(she/her/hers)

Vapor Intrusion Team Leader / Hydrogeologist

Remediation & Redevelopment Program / Environmental Management Division

Wisconsin Department of Natural Resources

625 E. County Road Y, STE. 700, Oshkosh, WI 54901-9731

Cell Phone: (920) 360-0853

jennifer.borski@wisconsin.gov



From: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>

Sent: Friday, April 5, 2024 1:08 PM

To: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>

Cc: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>; Laura.Scudiere@co.marathon.wi.us; Kate.Florek@co.marathon.wi.us;

Hoverman, Robert R - DNR (Rob) <robert.hoverman@wisconsin.gov>

Subject: RE: Wausau Groundwater Contamination Superfund Site

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Hi All,

See the below summary of Jeff Paddock and my conversation with the liable party's contractor (GHD) and building operator (Jacob). I've attached the fact sheets and contact list that will be sent to building occupants.

Let me know if you have any questions or comments regarding the issue!

~~~ Message Begins ~~~

Thanks for meeting regarding the VI exceedance in Building B. Below are some next steps based on our discussion:

1. Jacob confirmed there are no people who can get pregnant who work in the building. If this changes (new hire, visitor, etc.), that person should be informed about the risks TCE inhalation poses to fetal heart development (provide them with fact sheets and contact list attached to this message).
2. Jacob will post signs around the area of indoor air exceedance that alerts occupants that they shouldn't spend more than 20 minutes in that zone.
3. Jacob will send all building occupants TCE and vapor intrusion fact sheets along with a contact list for follow up questions (attached to this message)
4. GHD will develop and submit to EPA and WDNR a communications plan that describes who will be contacted and under what circumstances when an indoor air exceedance is detected. Generally, EPA, WDNR, Rexnord/Jacob, and building occupants (through Jacob or another communications channel) should be notified within 48 hours of any exceedance. Preliminary, unvalidated, data indicating an exceedance occurred should trigger the communications plan.
5. GHD will develop and submit to EPA and WDNR a plan to evaluate preferential pathways, HVAC, indoor air flows, and any other aspects of building A and B that could influence short- (opening windows, increasing HVAC flow, etc.) and long- (sub-slab depressurization systems) term vapor intrusion mitigation strategies.

Let me know if I'm missing any takeaways we discussed or there are questions/comments.

~~~ Message Ends ~~~

Best,
Jeff Dewey

Remedial Project Manager (RPM)
Remedial Response Branch 2, Section 6
Superfund & Emergency Management Division
U.S. Environmental Protection Agency, Region 5
312-353-1526

From: Dewey, Jeffrey
Sent: Friday, April 5, 2024 9:48 AM
To: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>
Cc: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>; Laura.Scudiere@co.marathon.wi.us; Kate.Florek@co.marathon.wi.us; Hoverman, Robert R - DNR (Rob) <robert.hoverman@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

Thanks for sending the additional links and bumping Jennifer's materials up. These are great.

Best,
Jeff D.

From: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Sent: Friday, April 5, 2024 9:23 AM
To: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>
Cc: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>; Laura.Scudiere@co.marathon.wi.us; Kate.Florek@co.marathon.wi.us; Hoverman, Robert R - DNR (Rob) <robert.hoverman@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

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Good Morning Jeff,

Resharing some links Jennifer Borski shared on Wednesday – the WI DHS TCE in the Air Fact Sheet (link below) and/or the [ATSDR ToxFQA's for TCE](#) might be what you're most interested in using to inform employee risk communication efforts:

- [TCE in the Air](#) (DHS) (for non-workers in buildings where TCE is not in use by a facility)
- [TCE in the Workplace](#) (DHS) (for workers where TCE is in use (e.g., solvent dip tanks) in the worker space and OSHA PELs apply)
- [Rapid Response Fact Sheet](#) (ITRC)

I also shared the following links with local health partners after Wednesday's Teams discussion. These link to memos where WI DHS provided formal comment on immediate response recommendations for TCE and other vapor intrusion chemicals of concern on the [Vapor Intrusion for Environmental Professionals Website](#), including:

- Letter from DHS to DNR defining a "single exposure" referenced in DHS March 25, 2021 letter:
 - [DHS Response to DNR Request for TCE Single Exposure Clarification June 6, 2022 \[PDF\]](#)
- Letter from DHS to DNR with recommended time frames and response actions at vapor intrusion sites:

- o [DHS response to Request for Assistance: Actions for Trichloroethylene at Acute Risk Levels \[PDF\]](#) March 25, 2021
- Letter from DHS to the DNR:
 - o [DHS response to Request for Opinion on risk guidelines in DNR's Vapor Intrusion Guidance RR-800: comments to immediate action criteria and Trichloroethylene \(TCE\) acute risk \[PDF\]](#) December 7, 2017

Please reach out if you have any follow up questions after reviewing this information. I'm happy to be listed as a point of contact for follow up health questions if that would be helpful, but I invite the local health representatives to take on that role if they would rather be the primary public health point of contact.

Best Regards,

Curtis

Curtis Hedman, Ph.D.
Research Scientist-Toxicologist
Bureau of Environmental and Occupational Health
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1 W Wilson St, Rm 150
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From: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>
Sent: Friday, April 5, 2024 9:02 AM
To: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>
Cc: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>; Laura.Scudiere@co.marathon.wi.us; Kate.Florek@co.marathon.wi.us;
Hoverman, Robert R - DNR (Rob) <robert.hoverman@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

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Hi Curtis,

I think you mentioned some informational literature related to VI on our call. Could you send that to the group when/if you have a minute? I found some EPA literature, but it's a little older.

Best,
Jeff D.

U.S. EPA

From: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Sent: Wednesday, April 3, 2024 11:14 AM
To: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>;
Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>
Cc: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

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Confirming, 2 pm sounds good - thanks.

Curtis Hedman, Ph.D.
Research Scientist-Toxicologist
Bureau of Environmental and Occupational Health
Division of Public Health, Wisconsin Department of Health Services
1 W Wilson St, Rm 150
Madison, WI 53701

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From: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Sent: Wednesday, April 3, 2024 11:02 AM
To: Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>; Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>; Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Cc: Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

I can make 2:00

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Jeff Paddock

Phone: 715-828-8544

Jeffrey.Paddock@Wisconsin.gov

From: Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>
Sent: Wednesday, April 3, 2024 10:45 AM
To: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>; Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Cc: Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

I can make 2pm work otherwise a 2:30 start could work too.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Matt Thompson

Office: 715-492-2304

MatthewA.Thompson@wisconsin.gov

From: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>
Sent: Wednesday, April 3, 2024 10:39 AM
To: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Cc: Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

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Hi all,

I'm currently free anytime today except from 1:00pm-1:30pm.

How does 2:00pm work for everyone? If so, I'll send out a Teams invite. If not, let me know and we can find another time.

Best,

Jeff Dewey

From: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Sent: Wednesday, April 3, 2024 10:26 AM
To: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>
Cc: Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>; Borski, Jennifer - DNR <Jennifer.Borski@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site



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Hi All –

Given the high indoor air TCE concentrations observed in February, I would be interested in a Teams call this afternoon to coordinate next steps. A key early consideration will be gathering demographics to determine whether any individuals who are or may become pregnant are potential TCE exposure receptors in the building. I'm available anytime between noon and 5 pm today.

I'm cc'ing DNR VI Team Lead, Jennifer Borski, for her situational awareness.

Best,

Curtis

Curtis Hedman, Ph.D.
Research Scientist-Toxicologist
Bureau of Environmental and Occupational Health
Division of Public Health, Wisconsin Department of Health Services
1 W Wilson St, Rm 150
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From: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>
Sent: Wednesday, April 3, 2024 10:01 AM
To: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Cc: Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>; Paddock, Jeffrey J - DNR <jeffrey.paddock@wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

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Hi Curtis,

Just a quick follow up to loop in the WDNR Site project manager (Jeff Paddock) and regional supervisor (Matt Thompson).

Best,
Jeff

From: Dewey, Jeffrey
Sent: Wednesday, April 3, 2024 9:08 AM
To: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

Hi Curtis,

Thanks for getting back to me. Initial Site information is below, but I'm happy to have a call or teams meeting (to share data easily) to get into more details. Overall, I'm messaging to let you know about the situation and get your perspective on what future actions and communications would be most helpful at this point.

The buildings are in the Wausau Groundwater Contamination Superfund Site and the Site is being remediated by a group of potentially responsible parties (PRPs) who are liable for ensuring the Site remains protective of human health and the environment.

Two occupied industrial metal parts manufacturing and testing buildings at the Site have been sampled for subsurface and indoor air TCE vapors since 2017. In the 2017 sampling event, the subsurface concentrations were ~9000 ug/m³ in one location of "building B", but 2023 summer sampling resulted in concentrations of 30,000 ug/m³. Indoor air was always detectable, but remained below 3 ug/L.

The most recent sampling event in February resulted in subsurface concentrations of 20,000 ug/m³, but this time indoor air was 214 ug/m³. This sample was the first to my knowledge that took place during true winter conditions and so may be caused by differences in HVAC, ventilation changes, or changes in preferential pathways. EPA's human health risk assessor/toxicologist determined the indoor air concentration represented an occupational hazard index of 24. EPA's removal management level for

indoor air TCE is a hazard index of 1.

The current assumed source of TCE vapors is assumed to be a municipal landfill where high concentrations of TCE were initially discovered. However, the Site's hydrogeology, soil sampling, and groundwater TCE concentrations do not support the landfill as a source unless there is a previously unknown preferential pathway from the landfill to this specific spot underneath the building. One hypothesis is there is a previously undiscovered hot spot source directly next to the industrial building where TCE may have been dumped during historic building operation.

EPA discussed internally whether OSHA standards are relevant in this case, but determined that because the VI source is not building/occupational activities, the CERCLA- and NCP-based requirements are appropriate to use. Our next steps will likely include requiring the PRPs to immediately propose and implement a vapor mitigation system/strategy. Then, submit a plan to identify and address the source of VI.

As mentioned above, happy to meet to discuss in more detail and to get your perspective on next steps.

Best,
Jeff Dewey

Remedial Project Manager (RPM)
Remedial Response Branch 2, Section 6
Superfund & Emergency Management Division
U.S. Environmental Protection Agency, Region 5
312-353-1526

From: Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Sent: Tuesday, April 2, 2024 3:52 PM
To: Maguire, Andrew <maguire.andrew@epa.gov>; Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>
Cc: Ribordy, Michael <ribordy.mike@epa.gov>
Subject: RE: Wausau Groundwater Contamination Superfund Site

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Thanks, Andy.

Jeff – my full contact info follows, and you can reach out by phone and/or email to provide initial site information.

Curtis

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From: Maguire, Andrew <maguire.andrew@epa.gov>
Sent: Tuesday, April 2, 2024 2:43 PM
To: Dewey, Jeffrey <Dewey.Jeffrey@epa.gov>; Hedman, Curtis J - DHS <Curtis.Hedman@dhs.wisconsin.gov>
Cc: Ribordy, Michael <ribordy.mike@epa.gov>
Subject: Wausau Groundwater Contamination Superfund Site

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Hey Curtis,

Hope you're doing well! Just shooting a message to put you in touch with an RPM, Jeff Dewey (cc'd) who's got a site in Wausau with some TCE VI issues. He didn't think DHS has been involved in this one and I thought you'd be a good person for him to connect with. Looks like it's got some commercial/industrial RML exceedances in a building with an active operation.

Anyway, you guys can take it from here, good luck.

Andy

Andy Maguire
On-Scene Coordinator
U.S. EPA Region 5
312-758-8672 (mobile)