



March 5, 2024

Mr. Douglas Ballotti, Director
Superfund & Emergency Management Division
U.S. EPA – Region 5
77 West Jackson Street
Chicago, IL 60604

Subject: Concurrence on the Explanation of Significant Differences, Wausau Groundwater Contamination Superfund Site, Wausau, Wisconsin
DNR BRRTS Activity #02-37-000017, FID No. 737105820
EPA Site ID: WID980993521

Dear Mr. Ballotti:

The Wisconsin Department of Natural Resources (Department) is providing you with this letter to document the Department's concurrence with an Explanation of Significant Differences (ESD) to the September 1, 1989, Record of Decision (1989 ROD), Operable Unit 2 (OU2), for the Wausau Groundwater Contamination (WGC) Superfund site (Site). We believe the modifications to the remedy described in the draft 2024 ESD comply with Wisconsin statutes and Administrative Code requirements.

The final site-wide remedies were identified in the 1989 ROD for OU2 and are the subject of the ESD. The remedial action objectives selected in the 1989 ROD were:

- Reduction of long-term exposure to low levels of volatile organic compounds (VOCs) from ingestion of drinking water;
- Protection from potential future use of private wells in contaminated groundwater; and
- Protection from emissions of contaminants from proposed water treatment systems that release VOCs to the atmosphere.

All of the components of the final cleanup decision, embodied in the ROD, have been successfully constructed; however, the groundwater cleanup standards have not been met and contaminated soil remains onsite. EPA is proposing changes to the scope of the remedy selected in 1989 ROD to address potential public health risks due to potable use of groundwater and potential vapor intrusion in onsite buildings.

This ESD documents one significant change to the selected remedy for OU2 and indicates that Institutional Controls (ICs) will be implemented to ensure that the remedy is protective of human health and the environment.

The ICs incorporated into the Site remedy for the OU2 include:

- A local municipal ordinance that restricts installation of wells and access to the groundwater plumes,
- A deed restriction on the former Wausau Chemical facility, and
- Wisconsin Continuing Obligations (COs) to restrict groundwater use and potential soil exposure in accordance with Wis. Stat. § 292.12. The COs will be identified in the IC Implementation and Assurance Plan and will be imposed when the IC Plan is approved.

The proposed remedial actions to address the source areas have already been implemented or are in the process of being implemented. The municipal ordinance and deed restriction are already in place and are effective. The Department concurs with the modifications to the selected remedy at the Site, as described above and in the draft 2024 ESD.

Thank you for your support and cooperation in addressing the contamination at the Wausau Groundwater Contamination Superfund site. Should you have any questions regarding this matter please contact Judy Fassbender at (414) 507-5571.

Sincerely,

A handwritten signature in black ink that reads "Christine Sieger". The signature is written in a cursive, flowing style.

Christine Sieger, Director
Bureau for Remediation and Redevelopment

Cc: Matt Thompson, WDNR
Chris Saari, WDNR
Jeff Paddock, WDNR
Jeff Dewey, RPM, EPA Region 5