

## Gray, Jane K - DNR

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**From:** Holt, Michael (he/him/his) <Holt.Michael@epa.gov>  
**Sent:** Tuesday, November 19, 2024 2:51 PM  
**To:** Gray, Jane K - DNR  
**Subject:** FW: Wausau Chemical Parking Lot

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**From:** Holt, Michael (he/him/his)  
**Sent:** Thursday, October 24, 2024 1:07 PM  
**To:** OJ Ojinaga <oj.ojinaga@ghd.com>  
**Cc:** Kaiser, Steven <kaiser.steven@epa.gov>  
**Subject:** Wausau Chemical Parking Lot

Dear OJ:

On September 25, 2024, you sent me an email in my capacity as the Remedial Project Manager (RPM) for the Wausau Groundwater Contamination Superfund site (the Site). You let me know that the City of Wausau intended to pave a portion of the former Wausau Chemical facility (the facility), which is located within the boundaries of the Site. As you are aware, this portion of the Site is subject to a recorded deed restriction.

I have reviewed the deed restriction and the work you are proposing. The deed restriction does not prohibit the City from paving a portion of the facility.

Before the City begins the work, I want to direct your attention to paragraphs 3., 4., and 5. of the deed restriction as well as the 2006 Pavement Cover and Building Maintenance Plan .

Paragraph 3 states, "If currently inaccessible soil contamination near or beneath the building is excavated in the future, the soil must be sampled and analyzed, may be considered solid or hazardous waste if residual contamination remains and must be stored, treated and disposed in compliance with applicable statutes and rules." It is not clear from your brief description of the work whether the City will excavate any currently inaccessible soil contamination near the building. If the City does excavate any currently inaccessible soil contamination near the building, it should comply with the requirements of paragraph 3.

Paragraph 4 states, "The existing pavement forms a barrier that will be maintained in order to minimize the infiltration of water, which prevents additional groundwater contamination." Once the City has paved a portion of the facility, the City should maintain the pavement so that it functions as a barrier to minimize the infiltration of water.

Paragraph 5 states, "If construction or installation of buildings, structures or other improvements occur on grid points 19-4 or 35-7 shown on Figure 1, then the affected soils at grid points 19-4 or 35-7 shall be sampled and managed in

accordance with applicable statutes and rules.” The City should determine whether paragraph 5 applies to the work and comply with the provisions of paragraph 5 if paragraph 5 does apply to the work.

The 2006 Pavement Cover and Building Maintenance Plan should continue to be followed as.

I trust that this email clarifies EPA’s position about the proposed work. Please keep me posted as the City proceeds with the work and let me know once the City has completed the work.

Thank you,

**D. Michael Holt III**

Remedial Project Manager

SEMD, Remedial Response Section 3

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