



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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December 21, 1990

Ms. Suzanne Coll  
Wisconsin Project Officer  
U.S. EPA - Region V, 5HS/12  
230 South Dearborn Street  
Chicago, IL 60604

*See* Subject: Wausau Water Supply Letter of Agreement

Dear Ms. Coll:

We are sending this letter to transmit our acceptance of the enclosed Letter of Agreement.

This Letter of Agreement defines the roles and responsibilities of the Environmental Protection Agency and the Department of Natural Resources as they pertain to the Final Remedial Design/Remedial Action at the Wausau Ground Water Contamination/Water Supply Superfund site.

Enclosed please find the signed original and two copies of the Letter of Agreement.

If there are any questions, please contact James M. McLimans at (608) 266-0830.

Sincerely,

Paul P. Didier, P.E., Director  
Bureau of Solid and Hazardous Waste Management

PPD /jm

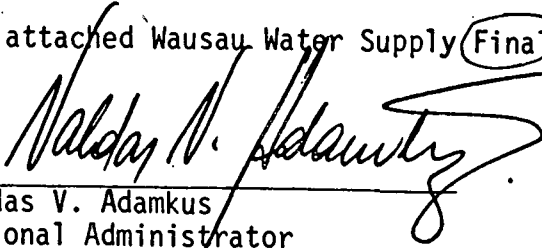
Enclosure

cc: M. DeBrock-Owens - NCD  
M. Giesfeldt/S. Bangert - SW/3

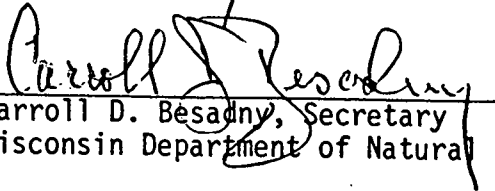
*P.S. Best wishes for  
a happy holiday season*

LETTER OF AGREEMENT

We the undersigned hereby agree to the Wisconsin Department of Natural Resources oversight roles and responsibilities for the Wausau Groundwater Contamination/Water Supply National Priorities List site as established in the attached Wausau Water Supply (Final) Remedial Action Work Plan.



Valdas V. Adamkus  
Regional Administrator



Carroll D. Besaony, Secretary  
Wisconsin Department of Natural Resources

ENVIRONMENTAL PROTECTION AGENCY/WISCONSIN DEPARTMENT OF NATURAL RESOURCES

SCOPE OF WORK  
FOR  
REMEDIAL DESIGN/REMEDIAL ACTION OVERSIGHT

AT THE

CITY OF WAUSAU WATER SUPPLY SITE  
FINAL REMEDIAL ACTION  
CITY OF WAUSAU, MARATHON COUNTY, WISCONSIN

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# Wausau Water Supply Final Remedial Action Work Plan

## 1.0 INTRODUCTION

The City of Wausau is located along the Wisconsin River in Marathon County, Wisconsin. The Wausau Groundwater Contamination/Water Supply Site encompasses an area in the northern section of the city which includes the city well field and five of its production wells.

The City of Wausau provides drinking water for approximately 33,000 people. The city presently operates six groundwater production wells, five of which are located on the north side of the city. A sixth well, Production Well CW8, is located adjacent to the Wausau Municipal Airport, on the south side of the city. The water from CW8 has a high concentration of iron and is used only during peak demand periods.

The City of Wausau discovered in early 1982 that its production wells CW3, CW4, and CW6, were contaminated by volatile organic compounds (VOCs), including trichloroethane, tetrachloroethene, and 1,2-dichloroethane, to name a few. In 1983, the city attempted to volatilize the chlorinated hydrocarbons through aeration, a technique that proved ineffective. In the spring of 1984, wells CW7 and CW9 showed VOC contamination at levels exceeding those recommended by EPA and DNR. At that time, EPA used Superfund emergency removal authority to install carbon filters on the public wells. The carbon filters were later replaced by two air strippers.

On December 23, 1988, the U.S. Environmental Protection Agency (EPA), with concurrence from the Wisconsin Department of Natural Resources (WDNR), issued a Record of Decision (ROD) for a Selected Interim Remedial Alternative at the Wausau Site. In accordance with that interim remedial alternative ROD, and a Consent Decree effective September 9, 1989, the City of Wausau and the Marathon Electric Manufacturing Company is proceeding with the installation of an extraction well and treatment of the extracted groundwater prior to discharge into the Wisconsin River. The purpose of the extraction well is to create a cone of depression capable of containing a contaminant plume source to prevent further migration toward city production wells.

The extraction well and associated treatment/discharge structures will be installed at the Marathon Electric facility in Wausau, Wisconsin.

On September 29, 1989, the U.S. Environmental Protection Agency (EPA), with concurrence from the Wisconsin Department of Natural Resources (WDNR), issued a Record of Decision (ROD) for a Selected Final Remedial Alternative at the Wausau Site. In accordance with that final remedial alternative ROD, and a Consent Decree, Marathon Electric Manufacturing Company, Wausau Chemical Company, and the City of Wausau is proceeding with the installation of Soil Vapor Extraction (SVE) systems and groundwater remediation utilizing the municipal supply wells. The purpose of the SVE systems is to remove the sources of contamination on the east and west sides of the Wisconsin River.

The SVE systems will be installed at the Marathon Electric facility and the Wausau Chemical facility in Wausau, Wisconsin. The site is located along the west and east sides of the Wisconsin River within the City of Wausau.

## 2. PROJECT APPROACH

WDNR has prepared the following work plan which describes the document review/approval recommendation and field oversight activities for the Wausau final action at the Wausau site in Marathon County, Wisconsin. The objectives of this project are:

- a. To review, comment, and recommend approval or conditional approval of all documents submitted by the Responsible Parties (RP) and the RP contractor(s) required in the Consent Decree for the remedial design and remedial action (RD/RA) for the final action at this site.
- b. To conduct field oversight of the RP and RP contractor(s) performance of the RD/RA.
- c. To conduct the community relations activities for the final remedial actions at this site.

Specific work plan activities are described in Section 3.0. Project Management and Administration, excluding costs, is outlined in Section 4.0. Since the work conducted under this cooperative agreement will be reimbursed directly by the RPs, in accordance with the Consent Decree, costs associated with this project are not included here. It is for this reason that this is a "zero dollar" cooperative agreement.

## 3.0 DESCRIPTION OF WORK

The activities in this work plan, which are described in detail in the following Tasks, are based on the Consent Decree and Scope of Work requirements.

### 3.1 TASK 1: PROJECT PLANNING

This task includes activities necessary to initiate the project, including review, comment, and a recommendation for approval of the Remedial Design/Remedial Action (RD/RA) Work Plan, the Health and Safety Plan (review and comment only), the Monitoring Program Plan, the Quality Assurance Project Plan (QAPP) (review and comment only), the Operation and Maintenance Plan, Project Modeling Plans, Design Plans and Specifications including the 30%, 60% and 95% and Final Engineering Plans and Specifications, and the Construction Quality Assurance (COA) Program Plan. The WDNR will also review and comment on monthly progress reports, draft and final RA reports and the Certificate of Completion.

### 3.2 TASK 2: REVIEW OF DESIGN PLANS AND SPECIFICATIONS

WDNR will review all engineering plans and specifications for the construction of the Soil Vapor Extraction (SVE) systems. WDNR will provide comments on draft documents within 30 days of receipt. WDNR will provide to EPA a recommendation of approval or conditional approval on draft final or final documents within 30 days of receipt. WDNR will participate in any meetings/conference calls with the RPs which EPA schedules or agrees are necessary to resolve issues regarding these plans. WDNR will also participate in pre-construction meetings, pre-final construction meetings and other technical meetings which take place with the RPs as part of construction.

### 3.3 TASK 3: FIELD OVERSIGHT WORK

The objective of the RD/RA oversight is to insure that all activities performed by the RP contractor and/or subcontractors comply with the Consent Decree and the EPA approved work plan or other associated plans. WDNR will conduct this oversight as directed by the EPA Remedial Project Manager (RPM), and this task will oversee the following activities at a minimum:

- \* Installation of the SVE systems.
- \* Installation and operation of the treatment of off-gas vapors from the SVE systems.
- \* Implementation of the monitoring program plan.
- \* The operation of existing municipal wells as a groundwater extraction system and utilization of existing municipal air strippers as treatment for extracted groundwater.

WDNR will maintain a logbook during any oversight of field activities. The log will include the following items:

- \* Date
- \* Activities performed during the day of the oversight
- \* Activities scheduled for the next day
- \* Problems encountered
- \* Problem resolution
- \* Departures from the Work Plan or other associated plans
- \* Personnel on the site
- \* Other relevant comments

Photographs will be taken to document all RP contractor field activities observed. For any week WDNR provides oversight of field activities, the WDNR will provide a weekly verbal report to the RPM summarizing the RP field activities executed and observed during that week. The WDNR will provide a written follow-up which includes a summary of the log book and verbal report on a monthly basis. If, in the opinion of the WDNR staff person on-site, a serious discrepancy is occurring between the site activities and the work plans, the WDNR person will notify the RPM as soon as practical, and will bring the discrepancy to the attention of the RP contractor. The discrepancy will be noted in the logbook.

WDNR will review all RP contractor change orders to the approved plans and reports. A discussion of significant deviations from that which is outlined in the approved plans/reports or ROD or Consent Decree will be prepared by WDNR for any significant changes. The discussion will be submitted to EPA for potential modification of the plans/reports, the ROD or the Consent Decree, if needed.

WDNR oversight personnel will follow the personnel protection and safety requirements that will be established in the RPs Health and Safety Plan, unless otherwise noted in the logbook.

WDNR will provide daily oversight of all field activities associated with the installation and construction of the SVE systems. WDNR will also provide daily oversight of the testing of the SVE system and implementation of the monitoring program.

WDNR will participate in a split sampling program as agreed upon by the EPA RPM during the RD/RA sampling activities. The RPM will be responsible for the split samples. WDNR will assist by collecting, packaging and shipping the samples.

Following completion of the field work associated with implementation of the final remedy, WDNR will prepare a final report which summarizes the activities of the RA construction and operation start-up. The report will discuss major problems/resolutions, and any deviations from the work plan that occurred. It will include a list of personnel, their affiliation and responsibility, who were on-site during WDNR oversight activities. The report will also include a description of the equipment on-site. The daily logs and photographs will be included in Appendices. This report will be submitted within 30 days after completion of the field work.

#### 3.4 TASK 4: PRE-FINAL AND FINAL INSPECTION

The WDNR will participate in the pre-final and final inspections of the completed remedy. WDNR will participate in all aspects of the project acceptance process, including deletion.

#### 3.5 TASK 5: SUBCONTRACTORS/CONTRACTORS

It is not anticipated that any contractors/subcontractors/consultants will be needed to carry out the oversight activities for this Final Remedial Action at Wausau. If the need arises to hire any individuals/organization, the request will be cleared by WDNR through the RPM and if needed, the RPs.

#### 3.6 TASK 6: COMMUNITY RELATIONS

WDNR will revise the original community relations plan, if necessary, to incorporate changes necessitated by the proposed final remedial activities. WDNR will submit the revised CRP to EPA - Office of Public Affairs and the RPM for comment prior to finalizing.



As part of the community relations plan, WDNR will ensure that the affected community is informed about the selected final remedy prior to its implementation. Community relations efforts will continue throughout implementation of the final remedial measure to ensure timely information dissemination. Activities may include public meetings, press releases and fact sheets. These will be coordinated with EPA.

#### 4.0 PROJECT MANAGEMENT AND ADMINISTRATION

The Project Management and Administration task is necessary to ensure that the work described in Section 3.0 is completed in accordance with the ROD and the Consent Decree for the Final Action. Project Management will consist of:

- \* Reviewing the RPs Monthly Reports summarizing activities completed during the month for consistency with WDNR review and oversight activities.
- \* Compiling Monthly Reports on the field oversight activities.
- \* Compiling a Quarterly technical status report to be submitted to the RPM summarizing estimates of work elements completed for each activity during that quarter, estimated time variances expected at the project completion, and any significant problems/finds encountered during that quarter.
- \* Tracking of RP deliverable schedules and submission dates against the Consent Decree requirements and providing this information a monthly basis.
- \* Recommendations to the RPM for and action required for noncompliance with the terms and conditions of the Consent Decree.
- \* Scheduling qualified personnel and resources.
- \* Trips to the site by the WDNR project manager and other assigned personnel to observe the execution of field tasks.
- \* Attend meetings with the RPM to discuss the RD/RA oversight plans.

Gary Kulibert, the North Central District Solid and Hazardous Waste Program Supervisor, has overall responsibility for ensuring that this project meets EPA's objectives and committing the resources necessary to meet the objectives of this project. The WDNR project manager, Michelle DeBrock-Owens, is responsible for implementing the project. The WDNR project manager will ensure that the technical and scheduling activities are successfully completed. This person will also report to the RPM (EPA - Region V) and will serve as the major contact for answering questions and providing information regarding the project. The WDNR project manager will be supported by environmental scientists, hydrogeologists, and engineers, as needed. All WDNR personnel involved in this project have completed the applicable personnel protection and safety training and are involved in a medical monitoring program.

The project schedule will be in accordance with an approved Work Plan schedule prepared by the RPs. Oversight activities will be scheduled based on this schedule.

## 5.0 ASSURANCES

The State makes the following assurances with respect to this project:

1. The State believes that the RPs have the technical, managerial and financial capability to undertake this Final Remedial Action.
2. The State agrees to notify EPA in the event that the RP's plans or actions change the scope of the work for tasks under this agreement. Prior to issuance, such changes will be submitted to EPA for review to ensure technical adequacy and compliance with the terms of this agreement.
3. The State agrees to prepare and implement a community relations plan for this site. The State will not initiate field oversight activities until EPA has approved this plan. The State agrees to comply with the National Contingency Plan and relevant EPA policy and guidance on RD/RA and community relations. EPA agrees to provide the State with the most current policy and guidance in a timely manner.
4. Where State laws or other restrictions may prevent the State from acting consistent with CERCLA, as amended by SARA, the State agrees to promptly notify and consult with EPA regarding the use of such laws or other restrictions.
5. The State agrees that it will request payment for activities conducted under this plan from the RPs, in accordance with the Consent Decree. The State also agrees that it will be responsible to the EPA RPM for all activities under this plan.