From:	Daniel (OJ) Ojinaga
To:	Copps, Clara
Cc:	Matt Groves; Thomas Kinney; Mel Ross; Gray, Jane K - DNR; Beedle, Michael; Endsley, Erin A - DNR; Eric Hoglund
Subject:	RE: Wausau Water Supply NPL Site - East Bank VI Sampling Work Plan
Date:	Friday, March 27, 2026 4:06:00 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png 12655584-LTR-19-Response to comments-East Bank VI Sampling Work Plan.pdf 12655584-RPT-63-East Bank VI Sampling Work Plan Rev. 1.pdf

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Hi Clara,

In response to the U.S. Environmental Protection Agency's comment letter dated March 3, 2026, we have revised the East Bank VI Sampling Work Plan for your review. Attached, you'll find both the updated work plan and a response to comments letter addressing the points raised.

Please review the attached work plan and let me know if you have any questions.

Thanks,
OJ

From: Copps, Clara <copps.clara@epa.gov>
Sent: Monday, March 16, 2026 8:19 AM
To: Daniel (OJ) Ojinaga <oj.ojinaga@ghd.com>
Cc: Matt Groves <Matthew.Groves@ghd.com>; Thomas Kinney <Tom.Kinney@ghd.com>; Mel Ross <Mel.Ross@ghd.com>; Gray, Jane K - DNR <jane.gray@wisconsin.gov>; Beedle, Michael <beedle.michael@epa.gov>
Subject: RE: Wausau Water Supply NPL Site - East Bank VI Sampling Work Plan

Hi OJ,

EPA approves this extension.

Thanks,
Clara

Clara Copps
Remedial Project Manager

Superfund & Emergency
Management Division, U.S. EPA
Region 5
Office Phone: 312-353-6431
Email: Copps.Clara@epa.gov

From: Daniel (OJ) Ojinaga <oj.ojinaga@ghd.com>
Sent: Friday, March 13, 2026 12:31 PM
To: Copps, Clara <copps.clara@epa.gov>
Cc: Matt Groves <Matthew.Groves@ghd.com>; Thomas Kinney <Tom.Kinney@ghd.com>; Mel Ross <Mel.Ross@ghd.com>; Gray, Jane K - DNR <jane.gray@wisconsin.gov>; Beedle, Michael <beedle.michael@epa.gov>
Subject: RE: Wausau Water Supply NPL Site - East Bank VI Sampling Work Plan

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Hi Clara,

I'm requesting a one-week extension for submitting the revised East Bank VI Sampling Work Plan. If approved, the new due date would be Friday, March 27, 2026. Please let me know if you need any additional information or have any questions regarding this request.

Thank you,
OJ

From: Copps, Clara <copps.clara@epa.gov>
Sent: Tuesday, March 3, 2026 2:21 PM
To: Daniel (OJ) Ojinaga <oj.ojinaga@ghd.com>
Cc: Matt Groves <Matthew.Groves@ghd.com>; Thomas Kinney <Tom.Kinney@ghd.com>; Mel Ross <Mel.Ross@ghd.com>; Gray, Jane K - DNR <jane.gray@wisconsin.gov>; Beedle, Michael <beedle.michael@epa.gov>
Subject: RE: Wausau Water Supply NPL Site - East Bank VI Sampling Work Plan

> Some people who received this message don't often get email from copps.clara@epa.gov. Learn why this is important

Hi OJ,

Attached are EPA and WDNR's comments on the Wausau East Bank VI workplan. Please

let me know if you have any questions or concerns. One thing to note is I set the due date for the revised report at 3/20. I'd like to keep it that way in order to keep things moving, but let me know if you will not be able to complete the revisions in that timeline.

Best,
Clara

Clara Copps
Remedial Project Manager
Superfund & Emergency
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Office Phone: 312-353-6431
Email: Copps.Clara@epa.gov

From: Daniel (OJ) Ojinaga <oj.ojinaga@ghd.com>
Sent: Wednesday, February 11, 2026 4:47 PM
To: Copps, Clara <copps.clara@epa.gov>; Gray, Jane K - DNR <jane.gray@wisconsin.gov>
Cc: Matt Groves <Matthew.Groves@ghd.com>; Thomas Kinney <Tom.Kinney@ghd.com>; Mel Ross <Mel.Ross@ghd.com>
Subject: Wausau Water Supply NPL Site - East Bank VI Sampling Work Plan

> **Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Clara and Jane,

In response to the U.S. Environmental Protection Agency's (EPA) letter dated June 23, 2025, and email correspondence dated September 17, 2025, GHD, on behalf of the Wausau Potential Responsible Party Group, has prepared the attached East Bank Vapor Intrusion Evaluation Work Plan for your review.

Please review the attached work plan and let me know if you have any questions.

Thank you,
OJ

Daniel (OJ) Ojinaga
Project Manager/Engineer

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Our ref: 12655584-LTR-19

March 27, 2026

Ms. Clara Copps
Remedial Project Manager
SEMD, Remedial Response Section 3
United States Environmental Protection Agency – Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Response to EPA Comments, EPA Review of East Bank VI Sampling Work Plan
Wausau Groundwater Contamination Superfund Site

Dear Ms. Copps:

In response to the U.S. Environmental Protection Agency's (EPA) letter dated March 3, 2026, we are providing the following responses to comments related to the Wausau Water Supply Superfund Site in Wausau, Wisconsin (Site). EPA comments are outlined in bold below, followed by GHD Services Inc. (GHD) responses in italics.

EPA Comments dated March 3, 2026:

1. **Page 2, section 2.2: With respect to requesting access to the off-site properties, at least two written attempts to gain access to a building should occur in addition to initial in-person and/or telephone contact attempts. A summary and documentation of all contact attempts should be created and submitted to outline the access attempts, which could include certified mail receipts for any letters sent. If these access attempts made by GHD are denied or not responded to, then GHD should work with EPA, DNR, and state/local health to coordinate additional/final access attempts. Copies of signed access agreements should be shared with EPA and WDNR.**

   Section 2.2 has been revised and now includes a statement that signed access agreements will be shared with EPA and WDNR.

2. **Page 2, section 2.3: Please clarify the timing of the initial building survey in relation to the sampling event. During this initial survey it may make sense to identify and/or remove all indoor vapor sources to reduce the disturbance to the resident.**

   Section 2.3 has been revised to provide additional clarity on the timing of the initial building survey.

3. **Page 3, section 2.4.1.1: As described in step 3, boring logs should be submitted for the exterior soil gas probes, as applicable. These should log moisture content of the soils.**

   Section 2.4.1.1 has been revised to include additional information regarding the soil logging, which will include the moisture content of the soils as part of the soil lithology and observations.

4. **Page 3, section 2.4.1.2: Oxygen content should be measured via field meter for exterior soil gas samples to assess for atmospheric air intrusion.**

We acknowledge your comment and are confident that the information in Section 2.4.1.2 sufficiently addresses concerns about atmospheric air intrusion.

5. **Page 5, section 2.4.1.4: Field blanks and duplicate samples should be collected during exterior soil gas sampling.**

   An additional section, Section 2.4.5, has been added to clarify QA/QC sample collection.

6. **Page 7, section 2.4.2.3: After the leak and shut-in tests are performed, at least three volumes of air from the sample train should be purged prior to collecting sub-slab vapor samples.**

   Section 2.4.2.3 has been revised to state that three volumes will be purged.

7. **Page 8, section 2.4.3: For indoor air sampling, windows and doors should be closed at least 24 hours prior to sampling and should be kept closed to the extent possible (except for normal entry and exit of the building) during sampling.**

   Section 2.4.3 has been revised to include further information about resident instructions. Appendix B provides GHD's instructions to residents.

8. **Page 8, section 2.4.3: Clarify the timing and order of sub-slab and indoor air sampling. With canister sampling, air samples should ideally be collected just prior to sub-slab sampling to eliminate the potential release of contaminants into indoor air during collection of the sub-slab vapor. This approach is also intended to minimize the disturbance to the resident. The DNR agrees with GHD that indoor air samples should be collected within 48 hours of the paired sub-slab samples.**

   Section 2.4.2 has been revised to clarify sample timing.

9. **Page 8, section 2.4.3: The work plan should include a section/statement on immediate actions that may be implemented if vapor action level exceedances are identified in indoor air. As such, WDNR and EPA should be notified if preliminary data exceeds 1x10-5 cancer risk and/or an HQ of 1. Additionally, the PRPs should have response procedures in place if preliminary indoor air and/or subslab concentrations are above 1x10-4 ELCR and a non-cancer HQ of 3 (HQ of 1 for TCE). Immediate actions applicable to acute health risk from inhalation may include increasing ventilation, deploying temporary air purification units, limiting occupancy, temporarily relocating occupants or other actions. Immediate actions may be selected in consultation with the DHS and the local health department. They should not wait for final data to take these actions.**

   Section 3 has been revised to include more information on the response to potential exceedances.

10. **Appendix A: Future written access requests should include a privacy act statement. EPA can provide the most updated version upon request.**

    Section 2.2 has been updated to incorporate reference to a privacy act statement.

11. **Appendix A: Future written access requests should include the state and local health contacts and the following DNR webpage, Vapor Intrusion Resources for Property Owners, Occupants & the Public: https://dnr.wisconsin.gov/topic/Brownfields/VaporPublic.html. This webpage has many useful resources that the residents could review, including factsheets about vapor intrusion in English and in Spanish (see "Factsheets" section).**

    Acknowledged.

If you have any questions on the changes to the report, please do not hesitate to contact us.

Regards,

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Project Manager

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BS/lg/LTR-19/S4

Copy to: PRP Group (Email)

East Bank Vapor Intrusion Evaluation Work Plan

Revision 1

Wausau Water Supply NPL Site

Wausau Group of Responsible Parties

March 27, 2026

The Power of Commitment

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Table 1 Proposed Residential Sampling Locations

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Figure 1 Site Location

Figure 2 Proposed Sampling Locations

Appendices

Appendix A Property Owner Introduction Letter Example and Access Agreement Letter Example

Appendix B Indoor Air Sampling Instructions to Building Occupants

1. Introduction

GHD Services Inc. (GHD) has prepared this East Bank Vapor Intrusion (VI) Evaluation Work Plan (Work Plan) for the Wausau Water Supply National Priorities List (NPL) Site (Site) in Wausau, Wisconsin, on behalf of the Wausau Group of Responsible Parties (Group).

1.1 Purpose

In response to the U.S. Environmental Protection Agency's (EPA) letter dated June 23, 2025, and email correspondence dated September 17, 2025, this Work Plan provides a proposed scope of work and field procedures for the additional VI evaluation and investigation on the East Bank of the Wausau Water Supply Superfund Site in Wausau, Wisconsin (Site). This Work Plan has been prepared in accordance with the EPA Region 5 VI Handbook (2020) and the Wisconsin Department of Natural Resources (WDNR) Vapor Intrusion Guidance (RR-800) (2026).

1.2 Scope and limitations

This work plan has been prepared by GHD for the Group, EPA, and WDNR and may only be used and relied on by the Group, EPA, and WDNR for the purpose agreed between GHD and the Group, EPA, and WDNR as set out in Section 1.1 of this report.

GHD otherwise disclaims responsibility to any person other than the Group, EPA, and WDNR arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this work plan were limited to those specifically detailed in the work plan and are subject to the scope limitations set out in this work plan.

1.3 Site Background

The Wausau Superfund Site is located on the north side of the City of Wausau, in north-central Wisconsin, along the Wisconsin River in Marathon County. The Site location is presented in Figure 1. The Site consists of two contaminant source areas separated by the Wisconsin River. The East Bank portion of the Site is related to solvent spills on property operated by Wausau Chemical Corporation (WCC). The West Bank portion of the Site is related to the former City of Wausau landfill. The former landfill property is presently owned by Regal Beloit Corporation (formerly Marathon Electric Company). These two properties are considered source areas for contaminants in the aquifer, which is the source of drinking water for the City of Wausau.

The EPA initially requested that the Group conduct a vapor intrusion study in correspondence dated February 23, 2016. Subsequently, between March 2017 and September 2019, the Group implemented the VI investigation at the Site, with findings documented and submitted to the EPA in the VI Evaluation Report (GHD, 2021). In a letter dated January 19, 2023, the EPA indicated that further vapor intrusion investigation was required. Additional investigations were subsequently performed by the Group in March 2023, August/September 2023, February 2024, March 2024, and February 2025.

1.4 Site Contaminants of Potential Concern

Site contaminants of potential concern (COPC) are limited to the following chlorinated volatile organic compounds (VOC):

East Bank

- Tetrachloroethylene (PCE)
- Trichloroethylene (TCE)
- Cis-1,2-Dichloroethylene (cis-1,2-DCE)
- Vinyl chloride

2. Field Investigation Activities

2.1 Additional East Bank VI Investigation and Proposed Sampling Locations

This work plan outlines the procedures for implementing the requested VI investigation and evaluation. The data obtained during this investigation will be used to update the conceptual site model relative to VI on the East Bank. Sub-slab vapor, indoor air, and soil vapor sampling has been requested for residential properties within 100 feet of groundwater, soil gas or sub-slab air samples that exceeded Vapor Action Levels or Vapor Risk Screening Levels during any past sampling events. EPA has provided a list of 14 residential properties where they are requesting paired sub-slab and indoor air samples be collected, and 4 additional residential properties where they are requesting exterior soil gas probes be installed and sampled. The requested locations are provided on Table 1 and Figure 2. The Group will attempt to obtain access to all 18 residential properties, however there is a possibility some residents will not provide access for sampling. Final sampling locations will be determined after access agreements are received as detailed in Section 2.2.

2.2 Property Access for VI Investigation

Upon approval of this work plan, GHD will compile owner/occupant information for the properties identified for VI investigation as listed on Table 1. Access agreements will need to be secured from property owners prior to conducting VI investigation activities. Initially, GHD will issue a letter to each affected property owner requesting access. The letter will include contact information, a privacy act statement, and an access agreement for execution by the resident. GHD will then follow up with non-responsive owners first by telephone, followed by door-to-door visits if telephone contact is not possible or is unsuccessful. GHD will provide copies of signed access agreements to EPA and WDNR.

Best efforts will be made to secure access from affected property owners. However, GHD will terminate attempts to seek access and notify EPA and WDNR if the property owner refuses access or does not respond to GHD's outreach efforts. GHD will consider a property owner to be non-responsive after the following reasonable efforts are undertaken:

- Transmittal of the initial access request letter via certified mail
- A minimum of three attempts to contact the resident by telephone or in person
- Hand delivery of an access request letter to the property
- Transmittal of a follow-up access request letter by certified mail

2.3 Initial Building Survey

An initial building survey will be conducted at residences where access has been granted a minimum of 48 hours prior to sampling. The information obtained from the inspection will be used for determining sub-slab vapor pin placement, document construction details, and to identify potential background sources which may impact sampling results. The inspection will focus on the following:

- Construction type (i.e., slab-on-grade, crawlspace, basement, etc.)
- Basement/crawlspace construction (including floor and wall type)
- Presence and location of potential diffusion routes (e.g., drains, sumps, cracks/joints in floors/walls, etc.)
- Heating, ventilation, air conditioning system(s), and water heater details
- Location and types of chemical storage within the structure.

2.4 Sampling Procedures

The following sections describe the installation of sampling devices and sampling procedures for each media to be evaluated during field investigation activities.

2.4.1 Exterior Soil Gas Probe Installation and Sampling

Based on communications with EPA it has been agreed upon that four soil gas probes will be installed within the property boundary, but not within the home at properties on the boundary of the 100-foot radius of previous exceedances.

2.4.1.1 Soil Gas Probe Installation

The proposed soil gas probe locations are depicted on Figure 2. The soil gas samples will be collected from soil gas probe locations advanced during this phase of work. The soil gas samples will be collected from approximately 10 ft below ground surface (bgs) to obtain data from a depth corresponding to the base of a typical residential basement.

1. Prior to conducting installation activities, GHD will verify access for each proposed soil gas probe installation location. Additionally, each location will be verified to be located away from sub-surface utilities and free of obstacles that may create a safety concern.
2. Installation of soil gas probes will be conducted utilizing direct push drilling, hand auger, or similar methods to advance the borehole at each location to the target depths. Installation method will be determined based on proximity to utilities, workspace conditions, and accessibility.
3. During installation, soil will be removed from the borehole. Soil lithology and observations will be recorded on a field log form or via digital data collection.
4. Upon reaching the target depth, a permanent soil gas probe will be constructed using a 6-inch long stainless-steel implant screen. The probe casing will be constructed using flexible tubing (e.g., Teflon® or Teflon® lined) of small diameter (e.g,1/4-inch to 3/8-inch) in combination with the prefabricated stainless steel implant screens.
5. The soil gas probe casing will extend above the ground surface and be fitted with a stainless steel or brass (e.g. Swagelok) cap to create an airtight seal.
6. After positioning the screened interval and casing into the borehole, the screen will be surrounded by a sand pack material (e.g., pea gravel or silica sand). When placing the sand pack into the borehole, approximately 1-inch of sand pack material will be placed under the bottom of the implant screen to provide a firm footing. The sand pack should extend to approximately 6-inches above the top of the implant screen to create a total sand pack thickness of approximately 1-foot.
7. A 1-foot bentonite seal will be installed directly above the sand pack and be hand hydrated. The remaining annular space will then be backfilled with hand hydrated bentonite (i.e. granular or chips) or neat cement grout to approximately 6-inches below the ground surface.
8. A flush-mount protective cover will be installed above the soil gas probe and cemented into place.
9. Soil gas probes will be allowed to sit for approximately 24 hours prior to sampling to allow vapors to equilibrate.

2.4.1.2 Soil Gas Probe Leak Testing

Leak testing will be performed as a quality control check to ensure ambient air does not leak into the soil gas probe or sampling assembly, which may affect (i.e., dilute) the analytical results. Contaminants in ambient air can also enter the sampling system and be detected in a sample from a non-contaminated sampling probe resulting in a "false positive" result. Leak testing will be conducted as described in the following two steps:

1. Vacuum Test: used to ensure that the tubing and fittings/valves that make up the sampling assembly are air-tight.
2. Helium Tracer Test: used to ensure that ambient air during soil gas sample collection is not drawn down the soil gas probe through an incomplete seal.

Step 1 Vacuum Test

1. The sampling assembly will be connected to the soil gas probe valve at the surface casing. Once connected, the sampling assembly will consist of the soil gas probe, the vacuum gauge supplied by the laboratory, a syringe, and Summa™ canister, all connected in series (i.e., in the order of soil gas probe, vacuum gauge, pump/syringe, and canister), using stainless-steel Swagelok® tee-connectors and fittings.
2. The syringe will be used to conduct the vacuum test. The vacuum test consists of opening the valve to the personal sampling pump/syringe while leaving closed the valves to the Summa™ canister and the soil gas probe. The pump/syringe will then be operated to ensure that it draws no air from the sampling assembly (i.e., creates a negative pressure, or vacuum within the sampling assembly), thus establishing that all assembly connections are air-tight. A negative pressure, or vacuum, will be established within the sampling assembly and should be registered on the attached vacuum gauge and sustained for at least 1 minute.
3. If the pump/syringe is capable of drawing flow, or if the vacuum is not sustained for at least 1 minute, all fittings and tubing will be checked for tightness (or replaced) and the vacuum test repeated.
4. The reading from the vacuum gauge pressure will be recorded in the field logbook or via electronic notes to demonstrate that the pump created a vacuum within the sampling assembly and that the vacuum was sustained for at least 1 minute.

Step 2 Helium Tracer Test

1. Helium will be used as the tracer compound to test for ambient air leakage down the annulus of the soil gas probe and into the soil gas sample as described below.
2. The presence of helium within the sampling assembly will be monitored during purging and prior to soil gas sample collection using a helium meter installed in line with the sampling assembly.
3. A containment unit (i.e. shroud) will be constructed to cover the soil gas probe surface casing. The containment unit generally consists of an overturned plastic pail or similar set into a ring of dry bentonite or non-volatile organic compound clay to create a seal between the ground surface and the rim of the pail. The pail can be set directly on top of the sampling assembly tubing connected to the soil gas probe, which when pressed into the dry bentonite, should create a sufficient seal around the tubing. The pail will have three holes: one to allow for the introduction of helium; a second one to allow for air trapped inside the shroud to escape while introducing the helium; and a third one to allow the sample tubing to pass through the shroud. The second hole will also allow for insertion of the helium meter to measure the helium content within the shroud.
4. Prior to soil gas probe purging, helium will be introduced into the containment unit/shroud to obtain a minimum 50 percent helium content level. The helium content within the containment unit will be confirmed using the helium meter and recorded in the field logbook or on a digital form. Helium will continue to be introduced to the containment unit during soil gas probe purging and prior to sampling. Care should be taken not to increase the pressure within the containment unit beyond that of atmospheric pressure.
5. During soil gas probe purging and prior to sampling, the helium meter will be connected in line with the sampling assembly. In the event that the helium meter measures a helium content within the sampling assembly of greater than 10 percent of the source concentration (i.e. 10 percent of the helium content measured within the containment unit), the soil gas probe will be judged to permit significant leakage such that the collected soil gas

sample will not be considered reliable and representative of soil gas concentrations within the formation. An advantage of using helium as the tracer compound is that a significant leak can be detected in the field.

2.4.1.3 Soil Gas Probe Purging

Following successful leak testing and prior to sampling, stagnant air must be purged from the sampling assembly tubes and soil gas probe casing/sand pack prior to sample collection.

1. The soil gas probe valve will be opened, and a pressure differential measurement will be obtained from the soil gas probe using a handheld meter (i.e., micromanometer) that can read down to 0.001 inches of water column. The pressure differential will be recorded in the field logbook or on a digital form.
2. Two volumes will be purged from the sample probe using the personal sampling pump. Measurements of the lengths and inner diameters of the above ground sampling assembly and below ground soil gas probe tubing, screen, and sand pack will be used to calculate the "purge volume" (the purge volume will consider the pore volume of the sand pack assuming a 30 percent sand pack porosity). A flow rate of 200 ml/min will not be exceeded during purging in order to minimize air infiltration. Purge volumes will be recorded in the field logbook or on a digital form.
3. The valve to the purge pump will be closed and the pump turned off.

2.4.1.4 Soil Gas Probe Sample Collection

Following soil gas probe purging and successful leak testing, the soil gas samples will be collected using the following procedures:

1. Temporary soil gas samples will be collected using batch certified clean vacuum canisters. Only canisters certified clean at the 100 percent level will be used for soil gas sampling activities. Vacuum canisters will have a capacity of 1-liter or 6-liters depending on laboratory requirements and availability.
2. The canisters will be fitted with a laboratory-calibrated critical orifice flow regulation device sized to restrict the maximum soil gas sample collection flow rate to approximately 100 milliliters per minute (mL/min). The 100 mL/min maximum flow rate is equivalent to a sample collection time of 10 minutes for a 1-liter canister and 60 minutes for a 6-liter canister, respectively.
3. A vacuum gauge will be supplied by the laboratory and used during sample collection to measure the initial canister vacuum, canister vacuum during sample collection, and residual canister vacuum at the end of sample collection.
4. The canister will be connected to the soil gas probe using a short length of ¼-inch Teflon or Teflon lined tubing. The canister will be connected to the soil probe along with the vacuum gauge. New tubing will be used for each sample.
5. To ensure some residual vacuum in each canister following sample collection, the canister vacuum will be recorded after approximately 8 minutes of the expected 10-minute sample collection duration. A maximum residual vacuum of 10-inches Hg is allowed. A canister residual vacuum above this value will require continued sampling until the vacuum reading is below this threshold. A minimum 1-inch Hg residual vacuum will be required for the sample to be considered valid, or the sampling will be repeated using a fresh Summa™ canister. Once the vacuum is measured, the safety cap must be securely tightened on the inlet of the vacuum canister prior to shipment to the laboratory under chain-of-custody procedures.
6. The critical orifice flow regulation devices (provided by the laboratory) and sampling assembly fittings/valves will not be re-used during sampling.
7. The vacuum canister samples will be labelled noting the unique sample designation number, date, time, and sampler's initials. A bound field logbook or digital record will be maintained to record all soil gas sampling data. Canisters will be repackaged in the fiberboard transport containers used by the laboratory to ship the canisters. Each canister will be accompanied by the original field data form/label and chain-of-custody documentation.

For field duplicate samples, a stainless-steel "tee" fitting and Teflon or stainless-steel tubing will be used to split the sample equally between two canisters. The field duplicate sample will be uniquely identified and submitted blind to the laboratory for analysis. One field duplicate will be collected for every 20 investigative samples or one per sampling event.

Soil gas samples will be analyzed for via the TO-15 method for TCE, cis-1,2-DCE, PCE, and vinyl chloride.

2.4.2 Sub-Slab Soil Gas Probe Installation and Sampling

Fourteen sub-slab vapor pins will be installed in the locations marked as proposed sub-slab sampling locations on Figure 2. Sub-slab samples will generally be conducted immediately upon indoor sampling completion due to the potential release of sub-slab soil gas into the indoor air which could impact sampling results. However, depending on access conditions, sub-slab sampling may need to be conducted prior to indoor air sampling. If sub-slab sampling must be conducted concurrently with indoor air sampling, every effort will be made to minimize potential impacts to the indoor air samples (e.g., containerize purge air, minimize time sub-slab probe is uncapped, etc.).

2.4.2.1 Sub-Slab Soil Gas Probe Installation

The following describes the procedures for the installation of sub-slab pins.

1. Prior to drilling holes in a foundation or slab, utilities coming into the building from the outside (e.g., gas, water, sewer, refrigerant, and electrical lines) will be located. The sample location will be cleared using knowledgeable site personal or a private utility locate company.
2. Prior to installation of the sub-slab Vapor Pin™, a rotary hammer drill will be used to drill a 1.5-inch diameter outer hole to a depth of approximately 1 inch below the surface that partially penetrates the slab. This outer hole will allow the protective cap to be flush with the concrete surface.
3. A small portable vacuum cleaner will be used to remove cuttings from the hole.
4. A rotary hammer drill with a 5/8-inch bit will be used to drill an inner hole through the remainder of the slab to a depth of 4 inches below the slab. Drilling into the sub-slab material will create an open cavity, which will prevent the obstruction of any pins during sampling.
5. A 3/4–inch diameter bottle brush and a small portable vacuum cleaner will be used to remove cuttings from the hole.
6. The thickness of the slab will be measured and recorded.
7. A Vapor Pin™ assembly will be driven into the 5/8-inch hole. The Vapor Pin™ creates an airtight seal without the need for cement.
8. The Vapor Pin™ will be capped to prevent air exchange between the subsurface and indoor air and a flush-mount cap will be placed at the concrete surface to not interfere with day-to-day use of the building.

2.4.2.2 Sub-Slab Soil Gas Probe Leak Testing

Leak testing will be used as a quality control check to ensure ambient air has not leaked into the soil gas probe or sampling assembly, which may affect (i.e., dilute) the analytical results. Contaminants in ambient air can also enter the sampling system and be detected in a sample from a non-contaminated sampling probe resulting in a "false positive" result. The leak testing will be conducted as described in the following two steps:

1. Vacuum Test: used to ensure that the tubing and fittings/valves that make up the sampling assembly are air-tight.
2. Water Dam Test: used to ensure that ambient air during soil gas sample collection is not drawn down the soil gas probe through an incomplete seal.

Step 1 Vacuum Test

1. The sampling assembly will be connected to the soil gas probe valve at the surface casing. Once connected, the sampling assembly will consist of the soil gas probe, the vacuum gauge supplied by the laboratory, personal

sampling pump/syringe, and Summa™ canister, all connected in series (i.e., in the order of soil gas probe, vacuum gauge, pump/syringe, and canister), using tee-connectors or tee-valves.

2. The personal sampling pump/syringe will be used to conduct the vacuum test. The vacuum test consists of opening the valve to the personal sampling pump/syringe while leaving closed the valves to the Summa™ canister and the soil gas probe. The pump/syringe will then be operated to ensure that it draws no air from the sampling assembly (i.e., creates a negative pressure, or vacuum within the sampling assembly), thus establishing that all assembly connections are air-tight. A negative pressure, or vacuum, will be established within the sampling assembly and should be registered on the attached vacuum gauge and sustained for at least 1 minute.
3. If the pump/syringe is capable of drawing flow, or if the vacuum is not sustained for at least 1 minute, all fittings and tubing will be checked for tightness (or replaced) and the vacuum test will be repeated.
4. The reading from the vacuum gauge pressure will be recorded in a field logbook or via electronic notes to demonstrate that the pump is able to create a vacuum within the sampling assembly (it will also be noted whether the low-flow detect switch on the pump was activated if used), and that the vacuum is sustained for at least 1 minute.

Step 2 Water Dam Test

1. The water dam test will be implemented upon completion of a successful vacuum test. The sampling assembly will already be connected to the soil gas probe from the prior step.
2. The concrete slab around the radius of the soil gas probe will be cleaned to remove dust and debris. Cleaning with VOC-containing substances will be avoided. A wet/dry vacuum is recommended. Wetting the concrete will be avoided or the concrete will be allowed to dry to ensure a good seal is formed for the test.
3. The water dam sleeve will be placed on the concrete and around the soil gas probe. The base of the sleeve will be sealed to the concrete slab using VOC free modeling clay or equivalent.
4. Distilled water will be poured into the sleeve around the base of the sub-slab probe until the probe and lower half of the connected sampling train valve are submerged within the sleeve to create a barrier between the ambient air and soil gas vapors.
5. Purging will commence as described below but will be halted if water is lost to the sub-slab or water is observed in the sampling assembly tubing. Note that concrete may absorb some of the water, which is normal. If water is lost down the probe or observed within the sampling assembly, the test will be stopped, and the water will be removed from the water dam to halt leakage. The sub-slab probe will be repositioned and the test repeated. If water was observed within the sampling assembly tubing, the tubing will be replaced and the vacuum test repeated prior to proceeding with the water dam test.

2.4.2.3 Sub-Slab Soil Gas Probe Purging

Following successful leak testing and prior to sampling, stagnant air must be purged from the sampling assembly tubes and soil gas probe casing/sand pack prior to sample collection.

1. The soil gas probe valve will be opened, and a pressure differential measurement will be obtained from the soil gas probe using a handheld meter (i.e., micromanometer) that can read down to 0.001 inches of water column. The pressure differential will be recorded in the field logbook or on a digital form.
2. Three volumes will be purged from the sample probe using the personal sampling pump. Measurements of the lengths and inner diameters of the above ground sampling assembly and below ground soil gas probe tubing, screen, and sand pack will be used to calculate the "purge volume" (the purge volume will consider the pore volume of the sand pack assuming a 30 percent sand pack porosity). A flow rate of 200 ml/min will not be exceeded during purging in order to minimize air infiltration. Purge volumes will be recorded in the field logbook or on a digital form.
3. The valve to the purge pump will be closed and the pump turned off.

2.4.2.4 Sub-Slab Soil Gas Sampling Procedures

1. The sub-slab sampling assembly will be connected to the Vapor Pin™. Once connected, the sampling assembly will consist of the soil gas pin, Teflon tubing, vacuum gauge supplied by the laboratory, personal sampling pump, and vacuum canister, all connected in series (i.e., in the order of soil gas pin, vacuum gauge, pump, and canister), using T-connectors or T-valves.
2. Sub-slab vapor samples will be collected using batch certified clean vacuum canisters. Only canisters certified clean at the 100 percent level will be used for soil gas sampling activities Vacuum canisters will have a capacity of 1-liter or 6-liters depending on laboratory requirements and availability.
3. The canisters will be fitted with a laboratory-calibrated critical orifice flow regulation device sized to restrict the maximum soil gas sample collection flow rate to approximately 100 milliliters per minute (mL/min). The 100 mL/min maximum flow rate is equivalent to a sample collection time of 10 minutes for a 1-liter canister and 60 minutes for a 6-liter canister, respectively.
4. A vacuum gauge will be supplied by the laboratory and used during sample collection to measure the initial canister vacuum, canister vacuum during sample collection, and residual canister vacuum at the end of sample collection.
5. The canister will be connected to the soil vapor pin using a sampling assembly comprised of short lengths of ¼-inch Teflon or Teflon lined tubing and polypropylene valves and fittings. The canister will be connected to the soil vapor pin along with the vacuum gauge and a purge pump (for soil vapor pin purging), in series. A T-valve will be used to connect the purge pump, which allows the pump to be isolated from the sampling assembly during sample collection. New tubing will be used for each sample.
6. Prior to collecting a soil gas sample, the stagnant air in the sampling assembly tubes and soil gas pin will be removed. The soil gas pins will be purged prior to sampling using a sampling pump at a flow rate of not more than 200 mL/min. Prior to sample collection, three purge volumes will be drawn from the pin/sample assembly.
7. At the start and the end of the purging period, the total concentration of volatile organic vapors of the pump exhaust gas should be monitored using a (PID). The PID will be connected in series after the personal sampling pump. PID readings will be recorded and entered in the field logbook. If VOCs are detected by the PID, the laboratory will be advised whether a sample could require dilution before analysis.
8. Following purging, the valve to the purge pump will be closed, and the valves to the soil gas pin and vacuum canister opened to draw the soil gas sample into the canister. This should be completed concurrent with continued application of the leak-testing water dam.
9. To ensure some residual vacuum in each canister following sample collection, the canister vacuum will be recorded after approximately 8 minutes of the expected 10-minute sample collection duration. A maximum residual vacuum of 10-inches Hg is allowed. A canister residual vacuum above this value will require continued sampling until the vacuum reading is below this threshold. A minimum 1-inch Hg residual vacuum will be required for the sample to be considered valid, or the sampling will be repeated using a fresh Summa™ canister. Once the vacuum is measured, the safety cap must be securely tightened on the inlet of the vacuum canister prior to shipment to the laboratory under chain-of-custody procedures.
10. The critical orifice flow regulation devices (provided by the laboratory) and sampling assembly fittings/valves will not be re-used during sampling.
11. The vacuum canister samples will be labeled noting the unique sample designation number, date, time, and sampler's initials. A bound field logbook will be maintained to record all soil gas sampling data.

Sub-slab vapor samples will be analyzed via the TO-15 method for TCE, cis-1,2-DCE, PCE, and vinyl chloride.

For field duplicate samples, a stainless-steel "tee" fitting and Teflon or stainless-steel tubing will be used to split the sample equally between two canisters. The field duplicate sample will be uniquely identified and submitted blind to the laboratory for analysis. One field duplicate will be collected for every 20 investigative samples or one per sampling event.

Sub-slab probes constructed in this manner can be abandoned by removing any tubing and all surface protective covers. The Vapor Pin™ can be removed using a tool provided with the installation kit. The hole can then be backfilled with cement grout.

2.4.3 Indoor Air Sampling

Fourteen indoor air samples will be collected on the lowest level of the building in the locations marked as proposed indoor air sampling locations on Figure 2. Indoor air samples will be co-located with sub-slab samples and indoor air sampling will be performed within 48 hours of sub-slab sampling, in accordance with WDNR guidance.

A summary of the steps involved in the indoor air sampling is presented below:

1. The indoor air samples will be collected using laboratory-certified pre-cleaned 6-liter stainless steel vacuum canisters. Canisters will be certified as pre-cleaned at the 100 percent level in accordance with EPA Method TO-15.
2. Sample canisters will be fitted with laboratory-calibrated critical orifice flow regulators sized to restrict the maximum air sample collection flow rate into the canister and provide a sample collection duration of approximately 24 hours.
3. The laboratory will supply a vacuum gauge for each canister and will be used during sample collection to measure the initial canister vacuum, canister vacuum during sample collection, and residual canister vacuum at the end of sample collection.
4. The canisters will be deployed at a typical breathing zone height of approximately 4 to 5 ft. above the floor/ground surface.
5. Indoor air sampling will be continued until the vacuum reading is between -10 and -5 in Hg. The vacuum gauge reading must not be greater than -1 in Hg for the sample to be considered valid. After recording the final canister vacuum reading, the canister valve will be closed and the safety cap securely tightened on the inlet of the canister. Sample canisters will be shipped to the laboratory under chain-of-custody procedures.
6. The canister serial numbers will be recorded, and a unique sample identification number will be assigned to each canister/sample identifying the sample number, date, time, and sampler's initials. A bound field logbook will be maintained to record all indoor air sampling field measurements.
7. Building occupants will be provided with instructions to follow during sample collection both verbally and via use of an instruction form. A copy of this form is included as Appendix B. Instructions will include keeping windows and doors closed and minimizing the use of potential background sources during sample collection. GHD will document conditions observed during sample deployment and retrieval in the field notes.

Indoor air samples will be analyzed via the TO-15 method for TCE, cis-1,2-DCE, PCE, and vinyl chloride.

For field duplicate samples, a stainless-steel "tee" fitting and Teflon or stainless-steel tubing will be used to split the sample equally between two canisters. The field duplicate sample will be uniquely identified and submitted blind to the laboratory for analysis. One field duplicate will be collected for every 20 investigative samples or one per sampling event.

2.4.4 Outdoor Ambient Air Sampling

Outdoor ambient air samples will be collected concurrently with indoor air sample collection. They will be collected from an upwind location from the investigative sample(s). A minimum of one outdoor ambient sample will be collected for each indoor air sampling location. However, a single outdoor ambient air may be utilized if indoor air sampling structures are located near one another.

A summary of the steps involved in the outdoor ambient air sampling is presented below:

1. The ambient air samples will be collected using laboratory-certified pre-cleaned 6-liter stainless steel vacuum canisters. Canisters will be certified as pre-cleaned at the 100 percent level in accordance with EPA Method TO-15.

2. Sample canisters will be fitted with laboratory-calibrated critical orifice flow regulators sized to restrict the maximum air sample collection flow rate into the canister and provide a sample collection duration of approximately 24 hours.
3. The laboratory will supply a vacuum gauge for each canister and will be used during sample collection to measure the initial canister vacuum, canister vacuum during sample collection, and residual canister vacuum at the end of sample collection.
4. The canisters will be deployed at a typical breathing zone height of approximately 3 to 5 ft. above the ground surface.
5. Ambient air sampling will be continued until the vacuum reading is between -10 and -5 in Hg. The vacuum gauge reading must not be greater than -1 in Hg for the sample to be considered valid. After recording the final canister vacuum reading, the canister valve will be closed and the safety cap securely tightened on the inlet of the canister. Sample canisters will be shipped to the laboratory under chain-of-custody procedures.
6. The canister serial numbers will be recorded, and a unique sample identification number will be assigned to each canister/sample identifying the sample number, date, time, and sampler's initials. A bound field logbook will be maintained to record all outdoor ambient air sampling field measurements.

Ambient air samples will be analyzed via the TO-15 method for TCE, cis-1,2-DCE, PCE, and vinyl chloride.

2.4.5 Quality Control/Quality Assurance

Quality control/quality assurance (QA/QC) samples will be collected during investigation activities. One duplicate sample will be collected for every 20 investigative samples. At a minimum, one duplicate indoor air, exterior soil gas, and interior sub-slab sample will collected during the investigation. Duplicate samples will be collected concurrently with their parent sample and will be incorporated into a single sampling assembly.

3. Reporting

After completing the scope of work described herein, a field investigation report will be prepared for submittal to WDNR and EPA. The report will include a narrative of the field investigation activities, tabulated data, figures, data interpretation, laboratory reports, and recommendations.

Preliminary data will be provided to EPA and WDNR if site specific screening criteria exceedances of TCE, cis-1,2-DCE, PCE, or vinyl chloride are identified in the sampling results. Additionally, GHD will discuss response approach options with EPA and WDNR prior to implementation to address exceedances on a case-by-case basis.

4. Schedule

Once property access is granted at all locations, installation and sampling at the specified points will begin. The aim is to conduct the first sampling event during the 2026 heating season.

Upon completion of the field investigations, a field investigation report will be submitted to WDNR and EPA within 60 days after receipt of the final laboratory report.

Table

Table 1

Proposed East Bank Sub-Slab, Indoor Air, and Soil Gas Sampling Locations
Wausau Water Supply Site
Wausau, Wisconsin

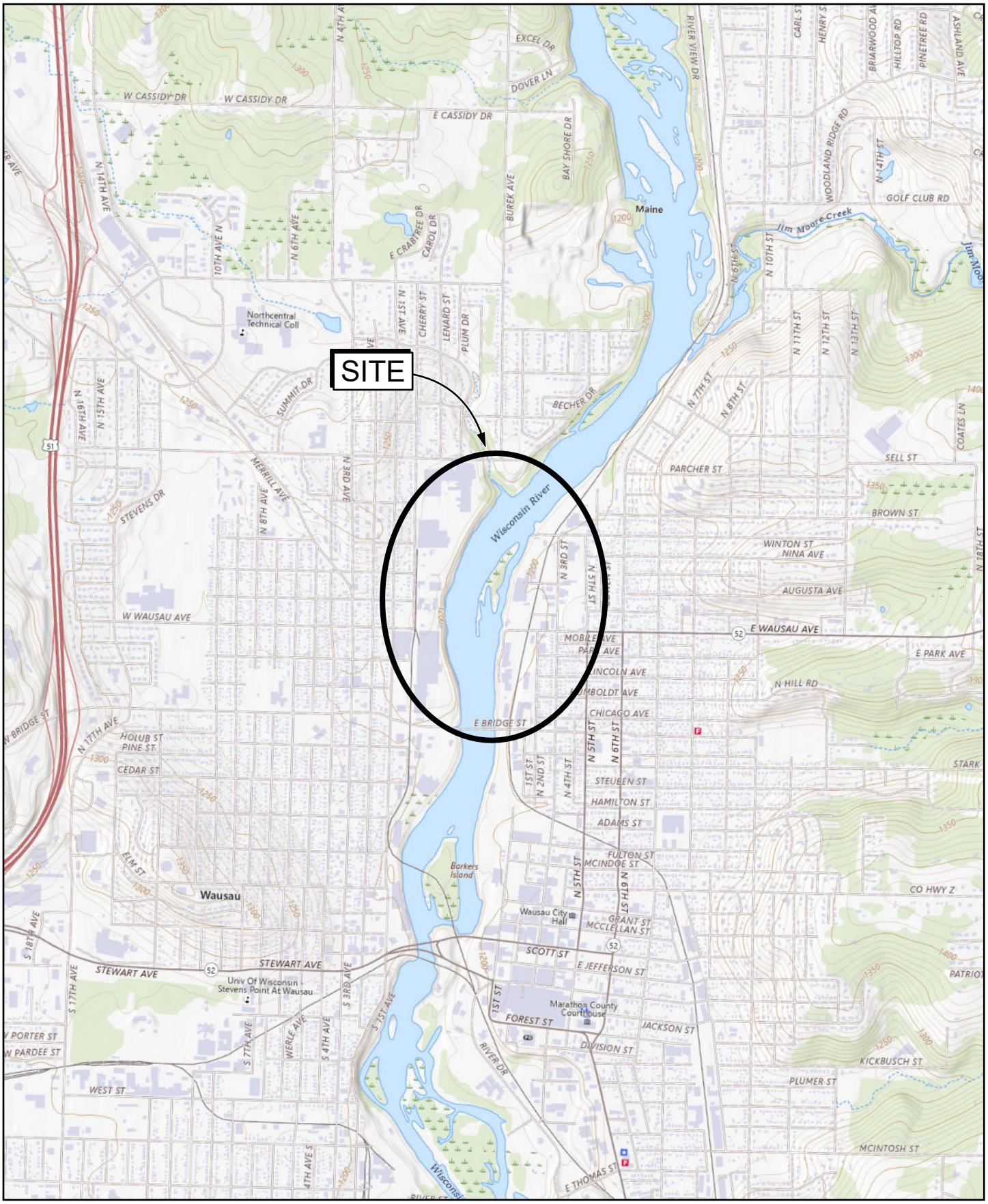
Sub-Slab and Indoor Air Sampling Location	
Address	**Last Sampled**
1901 N. 2nd St.	27-03-18
1905 N. 2nd St.	28-03-18
1909 N. 2nd St.	27-03-18
1910 N. 3rd St.	***
1915 N. 2nd St.	27-03-18
1916 N. 3rd St.	***
1917 N. 2nd St.	27-03-18
1918 N. 3rd St.	***
2002 N. 3rd St.	***
2006 N. 3rd St.	***
2010 N. 3rd St.	***
2102 N. 3rd St.	***
2106 N. 3rd St.	NS; Refused access in 2019
2108 N. 3rd St.	27-03-18

Soil Gas Sampling Location	
Address	**Last Sampled**
1902 N. 3rd St.	NS
1906 N. 3rd St.	NS
*2103 N. 3rd St.	NS
2105 N. 3rd St.	NS

Notes:

***	- New Sampling Location
01-01-26	- Previously sampled, no exceedances
01-01-26	- Previously sampled, past exceedances
NS	- Not sampled during previous sampling events
*	- Sub-slab sample collected 9/24/19, no exceedances

Figures



Paper Size ANSI A

0 500 1,000 1,500 2,000

Feet

Map Projection: Transverse Mercator
Horizontal Datum: North American 1983 HARN
Grid: NAD 1983 HARN UTM Zone 16N

N

GHD

WAUSAU WATER SUPPLY NPL SITE
WAUSAU, WISCONSIN

Project No. **12655584**
Revision No. **-**
Date **01/27/2026**

SITE LOCATION

FIGURE 1

O:\GIS\PROJECTS\12655000s\12655584\GIS\Maps\Deliverables\RPT\RPT063\12655584_RPT063.aprx
Layout: 12655584_001_SiteLocation; Print date: 27 Jan 2026 - 13:15

Data source: USGS The National Map. Created by: rjcoy

Paper Size ANSI B

0 50 100 150

Feet

Map Projection: Lambert Conformal Conic
Horizontal Datum: North American 1983 HARN
Grid: NAD 1983 HARN WISCRS Marathon County Feet

N

GHD

WAUSAU WATER SUPPLY NPL SITE
WAUSAU, WISCONSIN

PROPOSED EAST BANK VAPOR INTRUSION SAMPLE LOCATIONS

Project No. **12655584**
Revision No. **-**
Date **01/27/2026**

FIGURE 2

Q:\GIS\PROJECTS\12655000s\12655584\GIS\Maps\Deliverables\RPT\RPT063\12655584_RPT063.aprx
Layout: 12655584_002_ProposedLocations; Print date: 27 Jan 2026 - 13:15

Data source: Marathon County. Created by: rjcoy

Appendices

Appendix A

Property Owner Introduction Letter Example and Access Agreement Letter Example

11971 Westline Industrial Drive, Suite 101
St. Louis, Missouri 63146
United States
ghd.com

Our ref: 12655584-LTR-18

February 11, 2026

[Name]
[Address Line 1]
[City, State 00000]

Request for Access to Conduct Air and Soil Gas Sampling in Residence

Dear Property Owner,

GHD is the environmental consultant working on behalf of the Wausau Group of Responsible Parties for the Wausau Water Supply Superfund Site. As part of the ongoing environmental investigation on the Wausau Water Supply Superfund Site, we are writing to request permission to collect air and soil gas samples from your property, located at [Address Line 1] in Wausau, Wisconsin. This work is being requested by, and under the oversight of, the United States Environmental Protection Agency (USEPA) and Wisconsin Department of Natural Resources (WDNR).

The requested sampling is to evaluate potential vapor intrusion into structures from groundwater impacted by chlorinated volatile organic compounds (CVOCs) related to historical solvent releases from the former Wausau Chemical Corporation facility on North River Drive. This work is associated with the ongoing investigation, clean-up, and redevelopment of the former facility property. To date, soil and groundwater cleanup activities have been performed and concentrations in groundwater have been reduced significantly. However, remnants of contamination near the source area are still being evaluated. Due to its proximity to the impacted groundwater, your property was selected to participate in this vapor intrusion evaluation.

This work will be performed at no cost to you. In order to complete this work, a signed access agreement is required to provide us with access to conduct the pre-sampling inspection(s) and to collect indoor air and soil gas samples from your residence. To proceed with the sampling work, please sign and return the enclosed access agreement via the included pre-paid stamped envelope or email to the GHD staff listed below. Once received, this will allow GHD and its approved subcontractors access onto your property, with prior notice to you, for the purpose of completing the outlined sampling activities. The access agreement will remain valid for 5 years, however you have the right to decline access at any time.

We are available to answer any questions you may have regarding this matter. Once we have obtained your written approval, we will schedule a convenient time to complete the pre-sampling inspection at your residence to determine the best locations and methods for collecting air and soil gas samples. Following the inspection, we will complete the sampling activities. Data collection and laboratory analysis take approximately 45 days following each sampling event. The sampling results will be provided to you after they are validated.

The Project Managers for EPA and WDNR are Clara Copps and Jane Gray, respectively. Ms. Copps can be reached at **Copps.Clara@epa.gov** or (312) 353-6431. Ms. Gray can be reached at **jane.gray@wisconsin.gov** or (414) 435-8021.

If you have questions or concerns about this matter, please contact me directly at (520) 603-1923.

Regards,

Daniel (OJ) Ojinaga
Project Manager

(520) 603-1923
oj.ojinaga@ghd.com

Mel Ross
Project Coordinator

(314)943-7790
mel.ross@ghd.com

OJ/lg/LTR-18

Encl. Vapor Intrusion Questions – WDNR - (414) 435-8021
Vapor Intrusion Questions – USEPA - (312) 353-6431

Consent for Access to Property

Property Owner's Name: _____ Non-Owner Resident: _____

Property Address:

_____

_____

OWNER Contact Information:

Owner's Mailing Address (if different from Property Address above):

_____

Phone: _____ Email: _____

I consent to employees and authorized representatives of GHD Services Inc. (GHD) entering and having continued access to this property for the following purposes:

- Conduct sub-slab soil vapor sampling on the ground floor or basement.
- Conduct indoor air sampling.
- Take any necessary response actions to address any release or threatened release of a hazardous substance, pollutant, or contaminant the United States Environmental Protection Agency (EPA) determines may pose an imminent and substantial endangerment to the public health or the environment.

I realize that these actions taken by GHD are undertaken pursuant to the EPA's enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, 42 U.S.C.§§ 9601-9675.

This written permission is given by me voluntarily, on behalf of myself and all other co-owners or lessees of these properties, with knowledge of the right to refuse and without threats or promises of any kind.

Signature: _____ Date: _____

Please return to:

Mel Ross

Environmental Consultant – Wausau Superfund Project

Mel.Ross@ghd.com

GHD Services Inc

11971 Westline Industrial Drive Suite #101

St. Louis, MO 63146

Appendix B

Indoor Air Sampling Instructions to Building Occupants

Indoor Air Sampling Instructions to Building Occupants
(Form SP-29)

1. The duration of this test is approximately _____ hours.

2. The canister is made of clean stainless steel and has been certified clean as provided by the project laboratory. A copy of this certification can be provided to you upon request.

3. Starting at least 48 hours prior to and during the sampling event:

   - Do not handle or move a canister during testing
   - Do not smoke in the building
   - Do not open windows, fireplace openings or vents
   - Do not keep doors open
   - Do not use air fresheners or odor eliminators
   - Do not use wood stoves, fireplace or auxiliary heating equipment (e.g., kerosene heater)
   - Do not use paints or varnishes
   - Do not use cleaning products (e.g., bathroom cleaners, furniture polish, appliance cleaners, all-purpose cleaners, floor cleaners)
   - Do not use cosmetics, including hair spray, nail polish, nail polish remover, perfume, etc.
   - Do not apply pesticides
   - Do not store containers of gasoline, oil, or petroleum-based or other solvents with the building or attached garage (except for heating/fuel oil tanks)
   - Do not bring dry cleaning into the building
   - Do not operate or store automobiles in an attached garage

GHD will be back tomorrow to pick up the canister at about the time shown below.

Canister pick up: Day _____

Time _____

Thank you for your cooperation.

_____
Signature and Printed Name of Sampler

If you have any questions or concerns, please contact the following:

Name: _____

Phone: _____

Name: _____

Phone: _____

ghd.com

→ The Power of Commitment