



October 28, 2021

Mr. Mark Meurette
3M Company
144 Rosecrans Street
Wausau, WI 54401

KEEP THIS DOCUMENT WITH YOUR PROPERTY RECORDS

SUBJECT: Addendum to the April 24, 2008 Closure Letter
Downtown Parking Lot, 144 Rosecrans Street, Wausau
DNR BRRTS Activity #: 02-37-000273
FID#: 737009460

Dear Mr. Meurette:

On April 24, 2008 the Department of Natural Resources (DNR) issued a case closure letter with continuing obligations for the site identified above. The continuing obligations address potential exposure to that remain in soil and groundwater. Changes to the requirements of the case closure letter are identified in this addendum, in the Revised Conditions of Closure section, and are issued under Wis. Stat. § 292.12 and Wis. Admin. Code chs. NR 725, 726 and 727. Other continuing obligations included in the case closure letter remain in effect. This addendum is the approval of the request submitted to the DNR on October 6, 2021 following completion and documentation of actions taken.

The post closure modification request clarified the boundaries of the cap required at the time of case closure in 2008. An updated cap maintenance plan was included with this request and includes the new legal description for the cap.

Revised Conditions of Closure

The original cap maintenance plan dated March 15, 2006, included two parcel identification numbers: 291-2907-354-0974 and 291-297-354-0329. Based on a survey by REI Engineering, Inc., the cap required to prevent infiltration and direct contact with contaminated soils only applies to the parcel identified as #291-354-0329. The updated cap maintenance plan dated October 6, 2021 is attached and will be made available on the Department's online database. The Department understands that the cap will be inspected for integrity and necessary repairs made within 120 days of identification.

You and any future property owners must adhere to the requirements in this closure letter addendum, as well as any applicable continuing obligations applied to this property as identified in the April 24, 2008 case closure letter.

This closure addendum letter and information submitted with the post-closure modification request will be included in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) on the Web (BOTW) to provide public notice of residual contamination and continuing obligations. Find BOTW at dnr.wi.gov, search

“BOTW.” An online map view of the site can also be found on the RR Sites Map (RRSM) at dnr.wi.gov, search “RRSM.”

Thank you for your efforts to protect Wisconsin’s environment. If you have any questions regarding this letter, please contact the DNR Project Manager, Matt Thompson at (715) 492-2304 or by email at matthewa.thompson@wisconsin.gov.

Sincerely,



Matt Thompson- Hydrogeologist
West Central Region
Remediation and Redevelopment Program

Attachments:

April 24, 2008, Case Closure Letter
October 6, 2021, 3M Wausau Downtown Parking Lot – Cap Maintenance Plan

cc: Kevin Madson, 3M Company
Trenna Seilheimer, Arcadis



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary
Scott Humrickhouse, Regional Director

Wausau Service Center
5301 Rib Mountain Rd.
Wausau, Wisconsin 54401
Telephone 715-359-4255
FAX 715-355-5253
TTY Access via relay - 711

April 24, 2008

BRRTS #02-37-000273

MS KATIE WINOGRODZKI
3M ENVIRONMENTAL TECHNOLOGY & SERVICES
3M CENTER BUILDING 42-2E-27
PO BOX 33331
ST PAUL, MN 55133-3331

FILE COPY

Subject: Final Case Closure with Conditions Met, 3M Downtown Parking Lot,
144 Rosecrans Street, Wausau, Wisconsin

Dear Ms. Winogrodzki:

On July 14, 2005, the West Central Regional Closure Committee reviewed your request for closure of the case described above. The Department of Natural Resources reviews environmental remediation cases for compliance with state rules and statutes to maintain consistency in the closure of these cases. On July 21, 2005, you were notified that conditional closure was granted to this case.

On July 20, 2006 monitoring well abandonment documentation was submitted and the maintenance plan was submitted in March. By submittal of these documents you have complied with the requirements of closure.

In May 2006, Governor Doyle signed Brownfield's legislation that included a provision to stop using deed restrictions at closure. Therefore even though you have completed your deed restriction, you are not required to record it. You still need to meet the conditions of the restriction which included maintaining the cover on the site and receiving approval from the Department before initiating for following activities. They include: 1) removal of the existing barrier; 2) replacement with another barrier; 3) excavating or grading of the land surface; 4) filling on capped or paved areas; 5) plowing for agricultural cultivation; or 6) construction or placement of a building or other structure.

Based on the correspondence and data provided, it appears that your case has been remediated to Department standards in accordance with s. NR 726.05, Wis. Adm. Code. **The Department considers this case closed and no further investigation, remediation or other action is required at this time.**

Your site will be listed on the DNR Remediation and Redevelopment GIS Registry of Closed Remediation Sites. Information that was submitted with your closure request application will be included on the registry. To review the sites on the GIS Registry web page, visit <http://dnr.wi.gov/org/aw/rr/gis/index.htm> If your property is listed on the GIS Registry and you intend to construct or reconstruct a well, you will need Department approval. Department approval is required before construction or reconstruction of a well on a property listed on the GIS Registry, in accordance with s.NR 812.09(4)(w) Wis. Adm. Code. To obtain approval, Form 3300-254 needs to be completed

Ms. Katie Winogrodzki April 24, 2008
3M Technology & Environmental Services

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and submitted to the DNR Drinking and Groundwater program's regional water supply specialist. This form can be obtained on-line at the web address listed above.

Please be aware that the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety, or welfare or to the environment.

We appreciate your efforts to restore the environment at this site. If you have any questions regarding this letter, please contact me at (715) 359-6514.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Gutknecht".

Lisa Gutknecht
Bureau for Remediation & Redevelopment

c: Jennine Cota Trask/Marie Hull, ARCADIS
 Bob Brandt, Wauleco

3M Wausau Downtown Parking Lot - Cap Maintenance Plan

October 6, 2021

Property Location:

3M Company – Downtown Parking Lot
144 Rosecrans Street
Wausau, Marathon County, WI 54401
BRRTS #02-37-000273
PIN #291-2907-354-0329

This Cap Maintenance Plan, in accordance with the requirements of NR 724.13(2) of the Wisconsin Administrative Code, shall be applicable to the site which is described as that parcel of property presented in Exhibit 1 and Exhibit 2. The exhibits are attached hereto and made a part hereof (“Property”). A copy of this Cap Maintenance Plan shall, at all times, be kept on file in the offices of: (1) the Wisconsin Department of Natural Resources (WDNR) West Central Region; (2) the owner of the Property, its successors and assigns (hereinafter identified collectively as the “Owner”); (3) the Property manager, if any; and (4) the Property. Owner shall make the Cap Maintenance Plan available to contractors, utilities, and maintenance personnel and any other public or private persons or entities authorized to perform work at the Property.

The Cap, which is the subject of this Cap Maintenance Plan, is the approved Impervious Barrier consisting of the asphalt parking lot and building placed over the Unsaturated Soils. The Unsaturated Soils are hereby defined as the full depth of soils, extending from the ground surface to approximately 25.5 to 31.0 feet below ground surface. The Impervious Barrier is hereby defined as the asphalt surface and building placed over the Unsaturated Soils to function as a barrier to surface water infiltration, subsurface vapor migration, and to limit direct contact exposure.

The purpose of this Cap Maintenance Plan is to ensure the continued effectiveness of the Cap constructed at the Property as an Impervious Barrier, protective of public health and safety. The Cap Maintenance Plan will ensure the Cap continues to function as a barrier to surface water infiltration, direct contact exposure, and subsurface vapor migration at the Property and remain an integral component of Property-wide groundwater remediation.

The WDNR and its successor and assigns (hereinafter identified collectively as the “Department”) shall be notified of any activity, which is not in accordance with the deed restriction and this Cap Maintenance Plan.

Required Activities

Annual Inspections: Not less than annually and normally in spring after all snow and ice is gone, the Property shall be inspected by the Owner to ensure the integrity of the Impervious Barrier is maintained and no significant fissures, cracks, or other potential problems develop in the asphalt cap or building, which would allow a materially significant increase in the infiltration and percolation of precipitation or

surface water into the Unsaturated Soils. Any disturbances of the Impervious Barrier or significant fissures or cracks in the asphalt cap shall be noted. Upon completion of the inspection by the Owner, a brief report shall be prepared which identifies the date of the inspection, the individuals conducting the inspection, and any significant disturbances, fissures, or cracks in the Impervious Barrier. A copy of the inspection report shall be forwarded to the Department unless otherwise directed in the case closure letter and shall be maintained on file by the Owner, the Property manager, if any, and at the Property.

Repairs to Capped Area: If, during the annual inspection or other routine inspections of the Property, the Impervious Barrier is observed to have been disturbed or significant fissures or cracks are observed in the asphalt cap, the Owner shall arrange to have repairs made to such areas, in a manner consistent with this Cap Maintenance Plan. Such repairs shall be carried out within a reasonable period of time, not to exceed 120 days, subject to weather and seasonal considerations.

Restricted Activities

The following activities must comply with all listed requirements, and may require prior approval from the Department:

1. **Construction or Installation of Buildings, Structures or Other Improvements.** Buildings, structures or other improvements may be constructed or installed on the Property using footings or other foundations in the following manner:
 - A) The contractor performing the work shall be provided with a copy of this Cap Maintenance Plan by Owner and shall prepare a health and safety plan, appropriate to the work being performed.
 - B) All materials used in pavement or foundation shall not contain any hazardous substances which are leachable. Any Unsaturated Soils or granular layer materials which are excavated shall be transferred to appropriate 55-gallon drums for storage and shall be managed in accordance with state law. Any such excavation of Unsaturated Soils or granular layer materials shall be conducted in accordance with the health and safety plan, and all such excavated Unsaturated Soils or granular layer materials shall be kept on-site until completion of the work.
 - C) Upon completion of the work, clean soil or granular layered material shall be used to bring the excavation back to grade. The area of the excavation shall be restored in a manner consistent with the original Cap condition. All excavated soils shall be properly characterized and managed in accordance with state law with notice to the Department.
 - D) A memorandum report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming the Cap Maintenance Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Owner and the Property manager, if any, and shall be filed with the Department.

2. **Replacement and Repair of Impervious Barrier.** If it becomes necessary or desirable to replace or repair the asphalt cap, the repair or replacement shall be undertaken in the following manner:

- A) The contractor performing the work shall be provided with a copy of this Cap Maintenance Plan by Owner and shall prepare a health and safety plan, appropriate to the work being performed.
- B) All materials used in pavement or foundation shall not contain any hazardous substances which are leachable. Any Unsaturated Soils or granular layer materials which are excavated shall be transferred to appropriate 55-gallon drums for storage and shall be managed in accordance with state law. Any such excavation of Unsaturated Soils or granular layer materials shall be conducted in accordance with the health and safety plan, and all such excavated Unsaturated Soils or granular layer materials shall be kept on site until completion of the work.
- C) Upon completion of the work, clean soil or granular layered material shall be used to bring the excavation back to grade. The area of the excavation shall be restored in a manner consistent with the original Cap condition. Any replacement barrier must be equally impervious or better. All excavated soils shall be properly characterized and managed in accordance with state law with notice to the Department.
- D) A memorandum report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Cap Maintenance Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Owner, the Property manager, if any, and at the property, and shall be filed with the Department.

3. **Utility Installations or Repairs.** No utility repairs or installation of new or replacement utilities shall be conducted on the Property until after the utility and any contractor(s) for the utility have acknowledged receipt of a copy of this Cap Maintenance Plan. The utility repairs or installation(s) shall be conducted in strict conformance with the standards set forth below with respect to excavations into and/or beneath the Cap, such excavations are to be undertaken in the following manner:

- A) The contractor performing the work shall be provided with a copy of this Cap Maintenance Plan by Owner and shall prepare a health and safety plan, appropriate to the work being performed.
- B) Any Unsaturated Soils or granular layer materials, which are excavated, shall be transferred to appropriate 55-gallon drums for storage, and shall be managed in accordance with state law. Any such excavation of Unsaturated Soils or granular layer materials shall be conducted in accordance with the health and safety plan, and all such excavated Unsaturated Soils or granular layer materials shall be kept on site until completion of the work.

- C) Upon completion of the work, clean soil or granular layered material shall be used to bring the excavation back to grade. All materials used in backfill shall not contain any hazardous substances which are leachable. The area of the excavation shall be restored in a manner consistent with the original Cap condition. All excavated soils and groundwater affected by such activities shall be properly characterized and managed in accordance with state law with notice to the Department.
 - D) If the utility installation or construction involves any disturbance of the seals used to seal the entrance of utility lines and the structures on the Property, such seals shall be replaced with new seals of like or superior quality.
 - E) The utility shall prepare a memorandum report describing the work performed, identifying the person performing the work and the date of the work, and confirming that the Cap Maintenance Plan was adhered to in completion of the work. A copy of the report shall be kept on file with the utility, the Owner, the Property manager, if any, and at the Property and shall be filed with the Department.
4. **Subsurface Drilling Procedures and Requirements.** During subsurface drilling activities at the Property, drilling contractors shall at all times maintain compliance with the following requirements to ensure the integrity of the Cap and to avoid any potential cross contamination of soils and groundwater:
- A) The contractor performing the work shall be provided with a copy of this Cap Maintenance Plan by Owner and shall prepare a health and safety plan, appropriate to the work being performed. The work shall be supervised on-site by a qualified engineer or geologist.
 - B) All contractor personnel conducting or participating in work must be trained in hazardous site work as required by Occupational Safety and Health Administration 29 Code of Federal Regulations 1910.120 or its successor regulation. All soil sampling and drilling activities shall be conducted in accordance with American Society for Testing and Materials D1586-99 or its successor standard, and the specified environmental requirements contained in this document.
 - C) All drill cuttings and water/drilling mud generated during completion of the boring shall be transferred to appropriate 55-gallon drums for storage and shall be managed in accordance with state law.
 - D) Following completion of the boring and sample collection, the borehole shall be properly abandoned, in accordance with state law.
 - E) All drill casings, rods, samplers, tools, rig, and any equipment that comes in contact (directly or indirectly) with the subsurface soils and groundwater shall be steam cleaned on-site prior to set up for drilling. The same steam cleaning protocols shall be followed before leaving the Property following completion of work. Steam cleaning shall be conducted in such a manner

as to collect and contain residuals (water and soil) to prevent surface soil contamination. Residuals shall be drummed and managed in accordance with state law.

F) A memorandum report shall be prepared describing the work performed, identifying the person(s) performing the work and the date of the work, and confirming that the Cap Maintenance Plan was adhered to in completion of the work. A copy of the report shall be kept on file by the Owner, the Property manager, if any, and at the Property, and shall be filed with the Department.

5. **Surface Grading and Filling.** Any Unsaturated Soils or granular layer materials which are excavated shall be transferred to appropriate 55-gallon drums for storage and shall be managed and disposed of in accordance with state law. Any such excavation of Unsaturated Soils or granular layer materials shall be conducted in accordance with the health and safety plan, and all such excavated Unsaturated Soils or granular layer materials shall be segregated and kept on-site until completion of the work. Clean fill may be placed at the Property for the purposes of grading and such clean fill may consist only of clean natural soils, and granular material. Clean fill shall not contain any hazardous substances which are leachable.
6. **Amendment or Withdrawal of Cap Maintenance Plan.** This Cap Maintenance Plan can be amended or withdrawn by the property owner and its successors with the written approval of the Department.

Contact Information – October 2021

Site Contact:	Mark Meurette 3M Company 144 Rosecrans Street Wausau, WI 54401 (715) 845-0282	Kevin Madson 3M Company 3M Center, Bldg 224-5-W-17 Maplewood, MN 55114 (651) 381-2583
Consultant:	Trenna Seilheimer ARCADIS 126 North Jefferson Street, Suite 400 Milwaukee, WI 53202 (414) 276-7742	
Department:	Matthew Thompson Wisconsin Department of Natural Resources 1300 West Clairemont Avenue Eau Claire, WI 54701 (715) 492-2304	

Exhibit 1 - Legal Description for Area of Cap Located at PIN #291-2907-354-0329

A parcel of land, being part of the Northwest 1/4 of the Southeast 1/4 of Section 35, Township 29 North, Range 7 East, City of Wausau, Marathon County, Wisconsin, more particularly described as follows:

Commencing at the South 1/4 corner of said Section 35; thence North 89°45'49" East, coincident with the South line of the Southeast 1/4, 567.18 feet; thence North 00°14'11" West, 1526.94 feet to the point of beginning; thence North 00°01'07" East, 408.00 feet; thence South 89°58'53" East, 100.00 feet; thence South 00°01'07" West, 408.00 feet; thence North 89°58'53" West, 100.00 feet to the point of beginning.

Said parcel is 40,800 square feet, 0.937 acres, more or less.

Said parcel is subject to easements, restrictions, and rights-of-way of record.



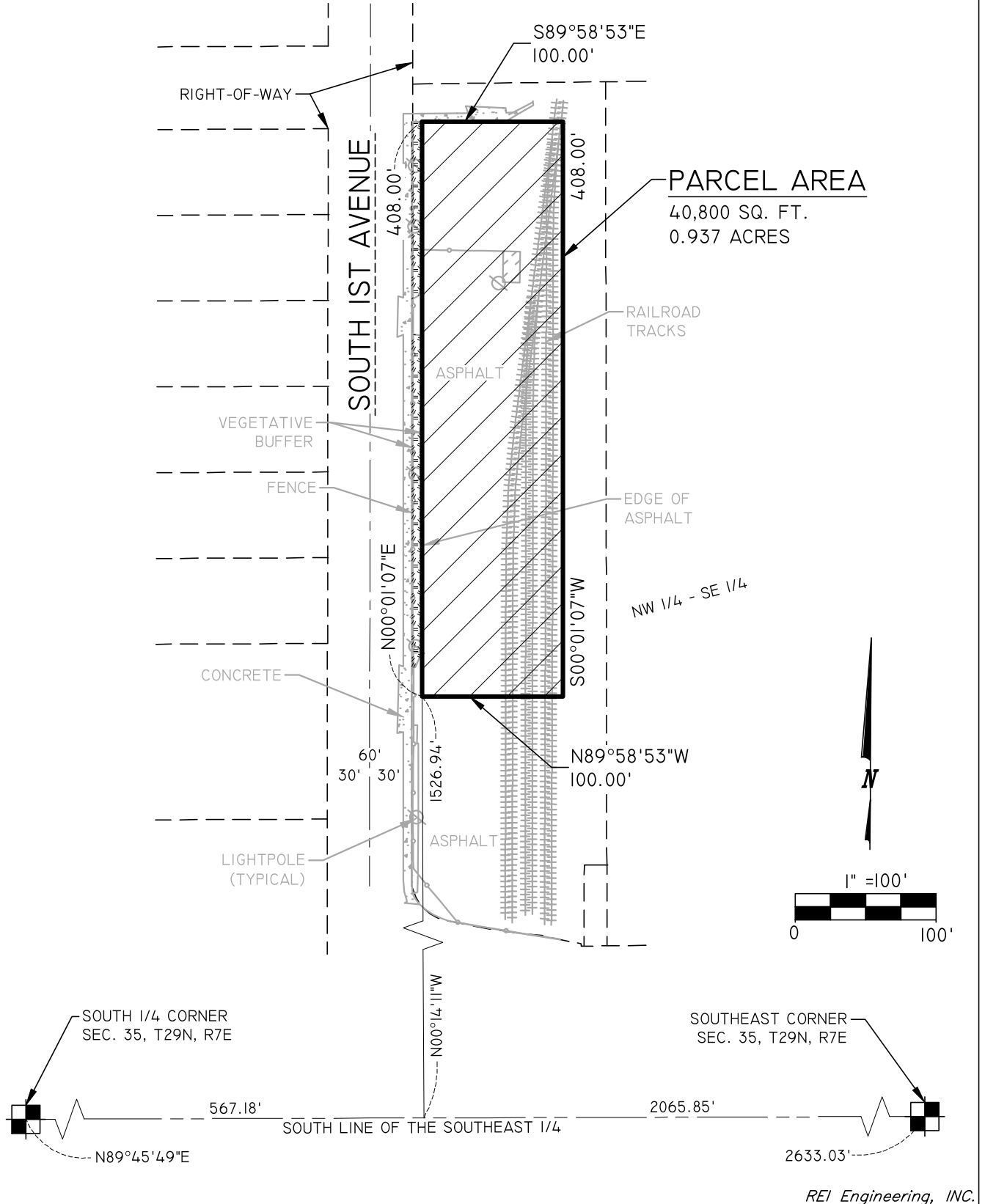
CIVIL & ENVIRONMENTAL
ENGINEERING, SURVEYING

EXHIBIT MAP

PART OF THE NORTHWEST 1/4 OF THE SOUTHEAST 1/4 OF SECTION 35,
TOWNSHIP 29 NORTH, RANGE 7 EAST, CITY OF WAUSAU, MARATHON
COUNTY, WISCONSIN.

NOTES:
I. FIELD SURVEY WAS COMPLETED 9-23-2021.

DRAWING FILE: P:\2300-2399\2315E - 3M - ARCADIS - WAUSAU PLANT - CAP SITE\DWG\2315E CAPPING EXHIBIT 2021.DWG LAYOUT: EXHIBIT MAP-VERTICAL PLOTTED: OCT 04, 2021 - 1:46PM PLOTTED BY: MELS



3M WAUSAU PARKING LOT CAP
SOUTH 1ST ST AVENUE
WAUSAU, WISCONSIN

FIGURE : EXHIBIT 2

PROJECT NO. 2315E

DRAWN BY: MJS

DATE: 9-27-2021

REI Engineering, INC.