State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 1300 W. Clairemont Ave. Eau Claire WI 54701

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July 24, 2023

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

> Subject: Department Approval – Comprehensive Vapor Intrusion Report 3M Wausau Downtown Parking Lot, 144 Rosecrans Street, Wausau, WI DNR BRRTS #: 02-37-000273, FID #: 737009460

Dear Mr. Meurette:

On May 18, 2023, the Department of Natural Resources (DNR) received a Comprehensive Vapor Intrusion Report (Report) submitted on your behalf by Arcadis U.S., Inc. Included with this report was a request for DNR review under Wis. Admin. Code § NR 716.15; in accordance with Wis. Admin. Code § NR 749.04 a review fee was also submitted.

The 3M Wausau Downtown Parking Lot site (Site) was closed on April 24, 2008, with continuing obligation imposed by the DNR for residual soil and groundwater contamination, both of which were caused by activities associated with the former Wausau Motors business. At the time of closure, vapor intrusion (VI) was a pathway not investigated at response action sites in Wisconsin hence VI was not considered at the time of closure.

On September 15, 2021, the DNR received a vapor intrusion pathway assessment from an adjacent response action site, Wauleco, Inc., outlining results of indoor air sampling and groundwater sampling performed on June 8, 2021. Following receipt of the results, and in lieu of reopening the Site, DNR requested a VI investigation work plan be submitted by 3M to address potential VI issues in the vicinity of the closed Site. The Report summarizes the results of VI assessment performed by Arcadis U.S., Inc. between February 2022, and March 2023.

Groundwater sampling results from the Report indicated the presence of chlorinated volatile organic compounds (CVOCs) at levels similar to when the Site originally closed at monitoring points downgradient of the Site. Vapor sampling results included sub-slab and indoor air sampling results from the Wauleco, Inc. site and residential properties along Thomas Street. The vapor sampling results demonstrate that CVOC vapors are not accumulating below or inside residential properties along Thomas Street or at the Wauleco, Inc. site. Based on these results, DNR does not believe additional VI assessment is necessary to determine if the VI pathway is viable near the Site.

The DNR appreciates 3M's willingness to complete this work and looks forward to working together on other projects in the vicinity of 3M's Downtown Wausau Facility. If you have questions regarding this determination, please contact me by phone at (715) 492-2304 or email at MatthewA.Thompson@wisconsin.gov.



Sincerely,

Matt Thompson Hydrogeologist Remediation & Redevelopment Program

cc: Trenna Seilheimer, Arcadis U.S., Inc., via email