

Mr. Matt Thompson
Hydrogeologist
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
1300 West Clairemont Avenue
Eau Claire, Wisconsin 54701

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126 North Jefferson
Street
Suite 400
Milwaukee
Wisconsin 53202
Phone: 414 276 7742
Fax: 414 276 7603
www.arcadis.com

Date: September 28, 2021
Our Ref: 30103263
Subject: 3M-Wausau, WI
Lot 2 (southern), Railroad Right-of-Way
Interim Actions Report
BRRTS Activity #02-37-587000

Dear Mr. Thompson,

On behalf of the 3M Company (3M), Arcadis U.S., inc. (Arcadis) is pleased to provide this Interim Actions Report for the southern portion of Lot 2 which consists of railroad track and right-of-way (ROW) in Wausau, Marathon County, Wisconsin (**Figure 1**). The purpose of this Interim Actions Report is to describe the remedial actions proposed for the southern portion of Lot 2 discussed with you during the September 7, 2021 conference call and to address the requirements outlined in the WDNR letter dated February 26, 2021.

Please note the WDNR letter states the Bureau for Remediation and Redevelopment Tracking System (BRRTS) Activity # for the Site is BRRTS Activity #02-37-375870; however, the BRRTS on the Web Activity # for the Site is shown as BRRTS Activity #02-37-587000.

Site Background

Lot 2 (1.74 acres) is one of three lots 3M purchased from Canadian National Railway in November 2020 (**Figure 2**). According to historical aerial photographs and topographic maps, the three lots appear to have been developed with railroad tracks since 1898.

The 3M Wausau facility is surrounded by BRRTS Activity #02-37-000273 (3M Wausau Downtown Parking Lot, Closed) to the west and #02-37-000006 (Wauleco SNE Corp, Open) to the east. The adjacent properties to the west of the facility have been owned by 3M since at least 1961 and the current development footprint surrounding the facility has been consistent since at least 1998, except for a railroad track expansion on the 3M Wausau Downtown Parking Lot in 2007.

Previous Investigation Activities

In September 2020, Arcadis conducted a Phase II Environmental Site Assessment (ESA) of Lot 2 as part of a property transaction. A total of five soil borings were advanced throughout the three lots with three borings being converted to temporary monitoring wells for groundwater sampling. Based on the analytical results for soil, arsenic exceeded the Natural Resources (NR) 720 Wisconsin Administrative Code (WAC) Direct Contact Industrial (DCI) screening criteria in four soil samples: SB-01 (0 to 4 feet below ground surface [bgs]) at 7.7

milligrams per kilogram (mg/kg), SB-02 (0 to 4 feet bgs) at 3.3 mg/kg, SB-04 (0 to 4 feet bgs) at 55 mg/kg, and SB-05 (0 to 4 feet bgs) at 8.6 mg/kg. Based on the analytical results for groundwater, all concentrations were either below the method detection limits or below the NR140 WAC Enforcement Standards and Preventive Action Limits screening criteria.

The analytical results of the September 2020 Phase II ESA were presented to WDNR via the *Notification for Hazardous Substance Discharge (Non-Emergency Only) Form 4400-225*, submitted on December 18, 2020. Supplemental investigation activities were proposed in the *Investigation Activities Plan* dated April 26, 2021. After receiving comments from WDNR, a *Revised Investigation Activities Work Plan* was submitted to WDNR on September 8, 2021. The interim remedial action described in this report was considered before submitting the *Revised Investigation Activities Work Plan*; specifically, the locations for investigation activities are intended to be outside of the areas proposed for remedial action. The *Revised Investigation Activities Work Plan* is currently in review with WDNR.

Interim Remedial Action

Due to ongoing water drainage issues observed in and around the southern portion of Lot 2, a drainage project has been planned for implementation prior to the winter season. Improper drainage in this area can create standing water on the railroad track or nearby switches which can freeze and impair rail car operation or worse, cause derailment. Although the drainage project involves several parcels near the 3M Wausau facility, the interim remedial action described in this report is limited to the southern portion of Lot 2 and is shown as the “Area Proposed for Remedial Action” on **Attachment 1, Figure 1**.

Based on the results from the September 2020 Phase II ESA, the southern area of Lot 2 has arsenic present in soil above the NR720 WAC DCI screening criteria. Due to the status of previous and ongoing investigation activities, it is not likely delineation and closure of the site will be completed prior to the winter season. Therefore, 3M is proposing to implement this interim remedial action as soon as possible in Fall 2021 to support the goals and timeline of the broader drainage project.

The design of the interim remedial action will include implementation of a clean cover system in areas of Lot 2 that will be disturbed during the upcoming drainage project. The intent of the clean cover system is to be protective of potential direct contact with soils that may contain arsenic and follow the WDNR NR724 guidelines and Remediation and Redevelopment (RR) 528/RR 709 publications to the extent practical. As presented in **Attachment 1**, the clean cover system consists of 12-inches of clean soil overlain by 12-inches of gravel (approximately 4-inch sized), except for the drainage area to the west of the switch which will have a cover system consisting of 2 feet of compacted road base material (**Attachment 1, Figure 4**). The interim remedial action is described in more detail on the following figures:

- **Attachment 1, Figure 2:** Proposed excavation and installation of drainage ditch located in the area east of the railroad tracks, between the tracks and adjacent Wauleco building.
 - The proposed drainage ditch (approximately 161 feet in length) will be excavated and overlain with 12-inches of clean soil, filter fabric and approximately 4-inch sized gravel that will be 12-inches in thickness.
- **Attachment 1, Figure 3:** Proposed installation of two concrete trench drains located between the railroad ties at the southern end of the proposed drainage ditch. Each trench drain is steel, approximately 6-inches by 18-inches in size and will be encased in 4-inch-thick concrete within the existing railroad track ballast.

- **Attachment 1, Figure 3:** Proposed excavation and grading of a drainage swale (approximately 26 feet in length) located west of the proposed concrete trench drains between the railroad tracks and parcel boundary.
 - The central portion of the proposed drainage swale (approximately 2 to 5 feet wide) will be excavated and overlain with 12-inches of clean soil, filter fabric, and approximately 4-inch sized gravel that will be 12-inches in thickness.
 - The sides of the proposed drainage swale (approximately 7 to 10 feet wide) will be excavated with a 2:1 slope and overlain with 12-inches of clean soil, filter fabric, and approximately 4-inch sized gravel that will be 12-inches in thickness.
- **Attachment 1, Figure 4:** Proposed excavation and grading of drainage area located west of the switch approximately 112 feet north of the railroad track and West Thomas Street intersection.
 - The proposed drainage area (approximately 16 feet in length and 4 feet wide) will be excavated 2 feet 7-inches bgs and overlain with filter fabric and backfilled with 2 feet of compacted road base material.

All excavated soils generated from this project at Lot 2 will be profiled and transported to Marathon County Landfill located in Ringle, Wisconsin for disposal.

A technical assistance fee-based review of this Interim Actions Report is being requested of WDNR. The *Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request Form 4400-237* is included as **Attachment 2** and a \$1,050 check will be submitted. Since the objective of the drainage project is to make drainage improvements prior to freezing conditions, a timely review of this report is appreciated.

After receiving WDNR approval of this Interim Actions Report, the interim actions will be implemented. The completion of the interim actions will serve as a remedy for the “Areas Proposed for Remedial Action” as presented in **Attachment 1, Figure 1**. A summary of the interim actions will be used to support the closure request for this BRRTS Activity # following the completion of remaining investigation activities.

Mr. Matt Thompson
Wisconsin Department of Natural Resources
September 28, 2021

Closing

Should you have any questions relating to the information presented herein, please feel free to call me at your earliest convenience.

Sincerely,
Arcadis U.S., Inc.



Trena Seilheimer
Certified Project Manager



Jennine Trask, PE
Account Manager

Email: trena.seilheimer@arcadis.com
Direct Line: 414 277 6262
Mobile: 260 348 4911

CC. Mr. Kevin Madson (3M Company)

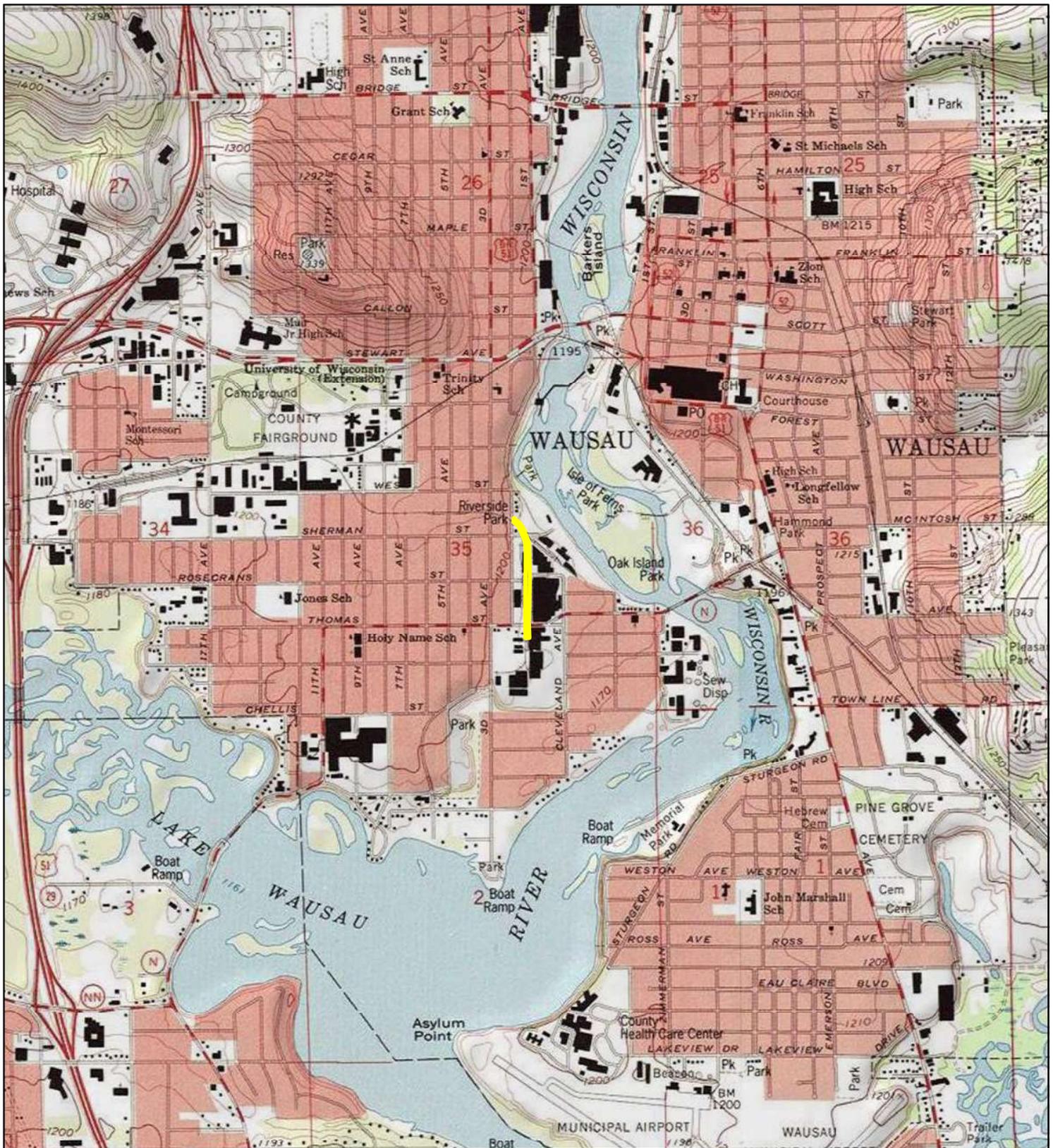
Enclosures:

Figures

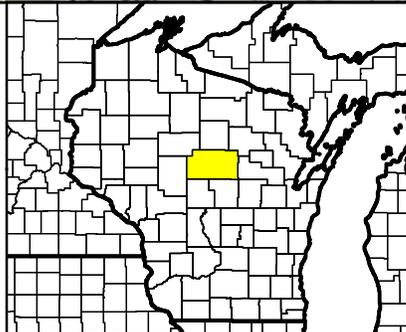
Attachment 1 – Southern Portion of Lot 2 Drainage Project

Attachment 2 – Technical Assistance, Environmental Liability Clarification or Post-Closure Modification
Request Form 4400-237

Figures



Legend
 Lot Boundary



**3M COMPANY
 RAIL LOTS
 WAUSAU, MARATHON COUNTY, WI**

SITE LOCATION MAP



FIGURE
1



Legend
 Lot Boundary



0 230 460
 Feet



**3M COMPANY
 RAIL LOTS
 WAUSAU, MARATHON COUNTY, WI**

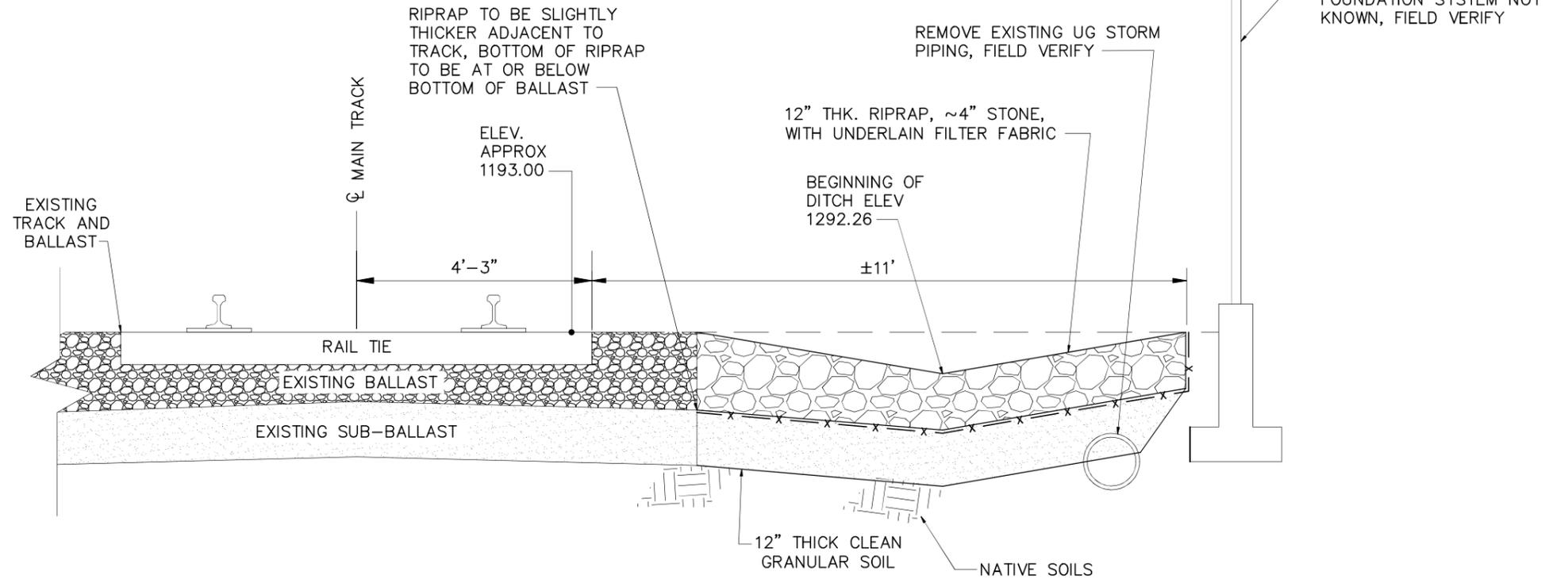
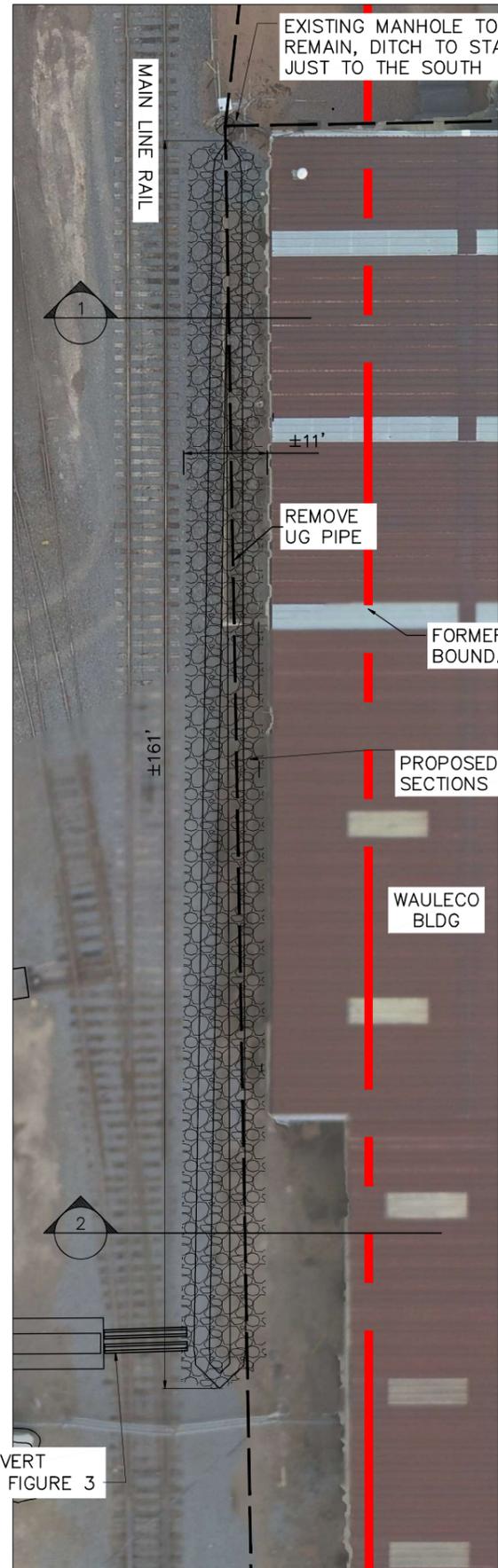
SITE LAYOUT MAP



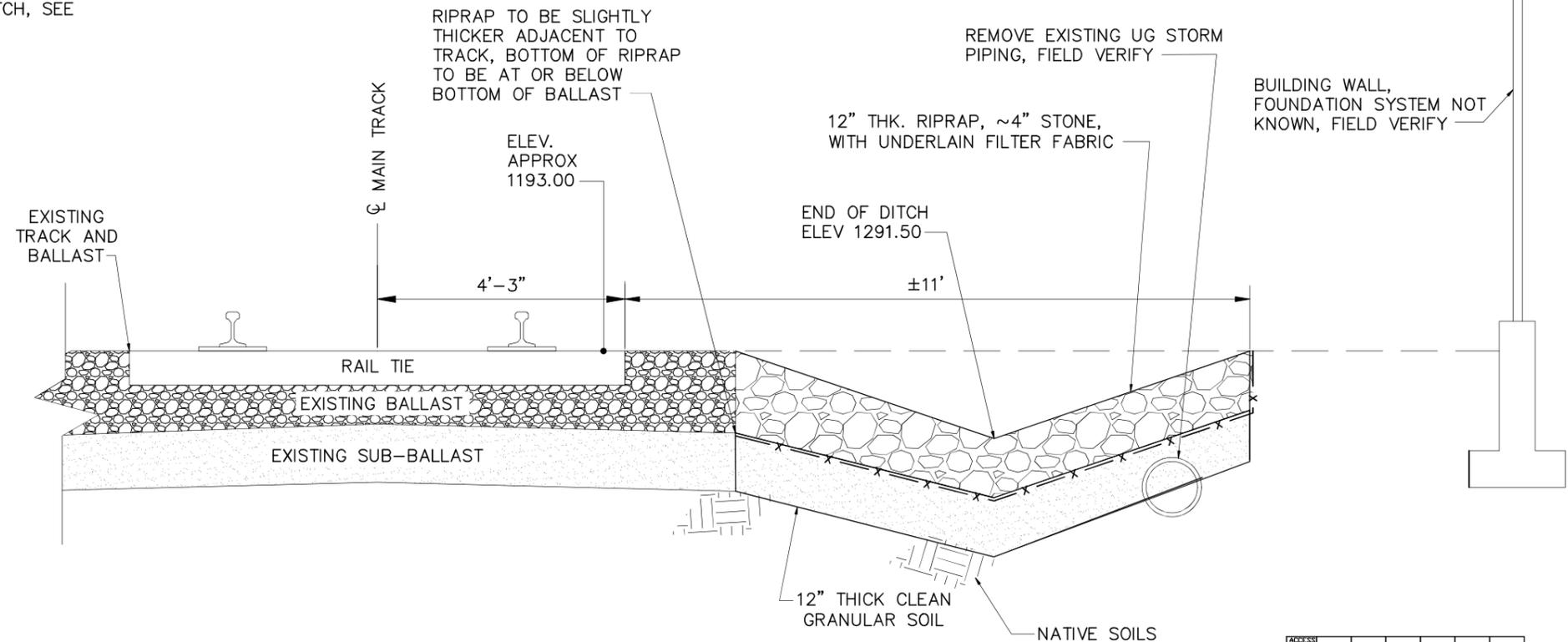
FIGURE
2

Attachment 1

Southern Portion of Lot 2 Drainage Project Design

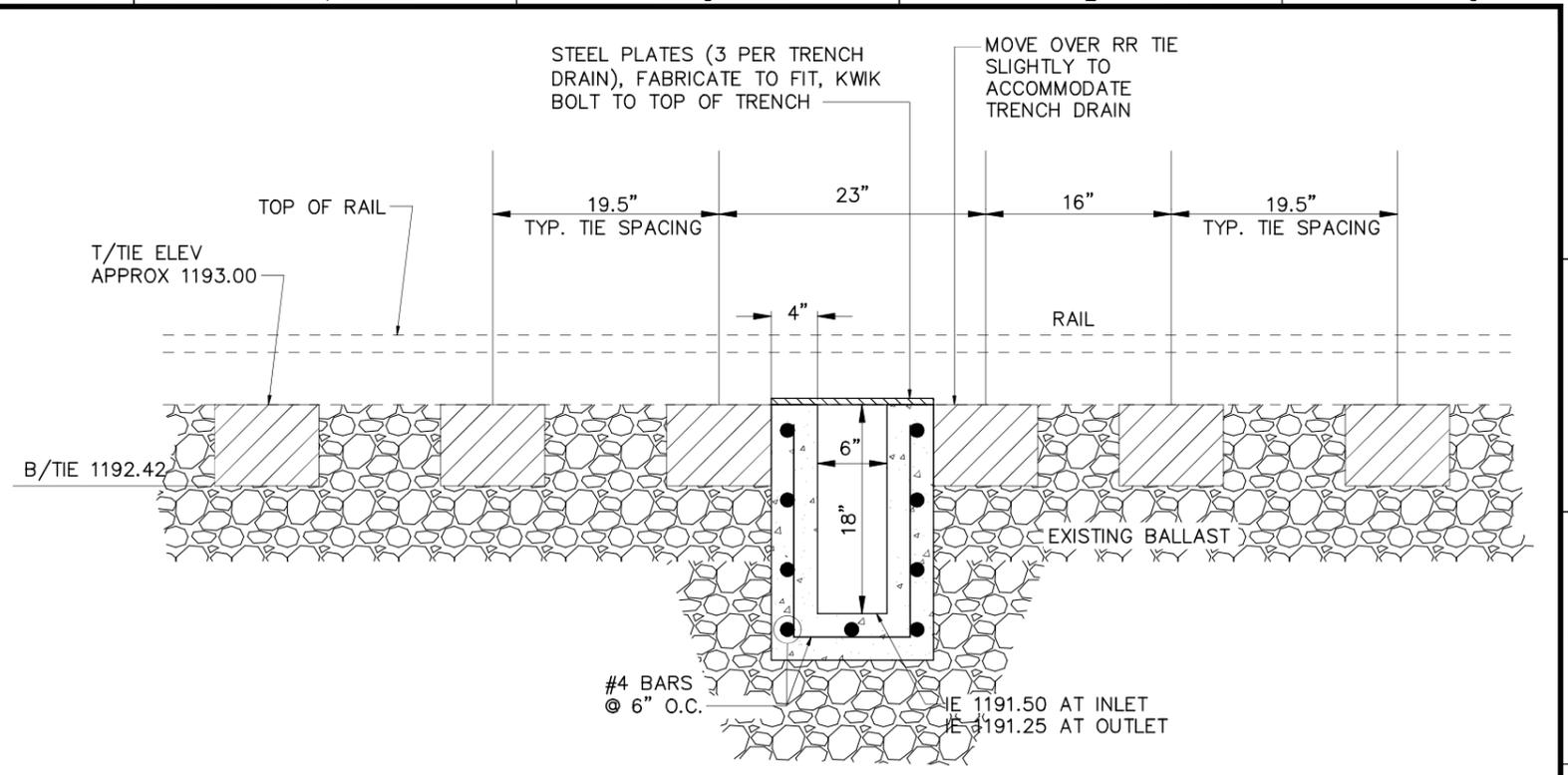
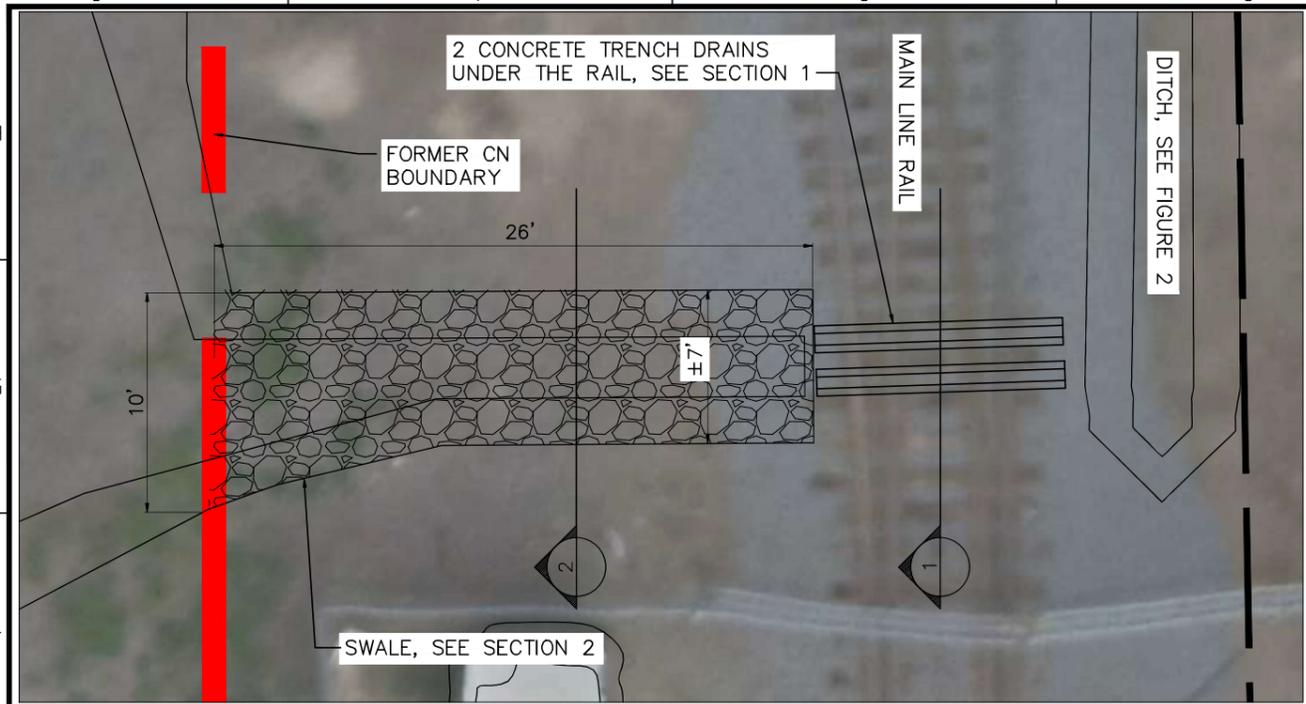


1 TYPICAL TRACK SECTION AT PROPOSED DITCH – SECTION 1

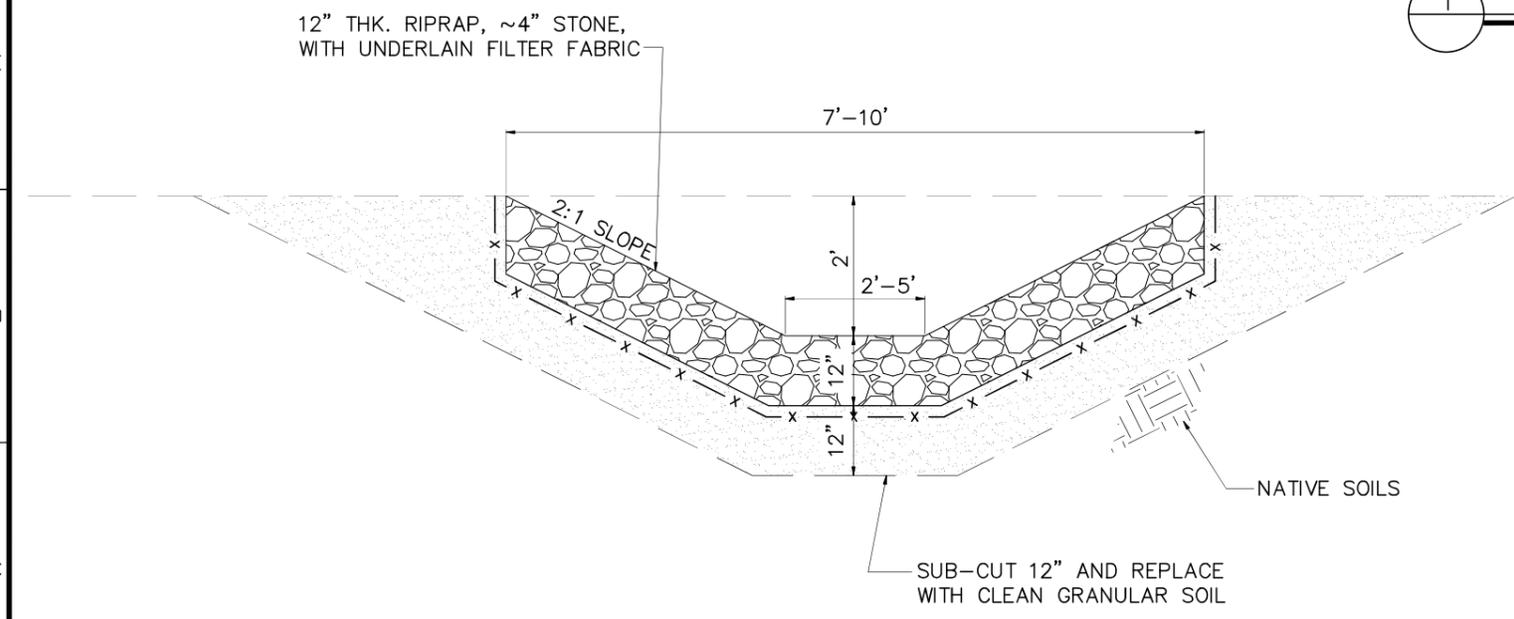


2 TYPICAL TRACK SECTION AT PROPOSED DITCH – SECTION 2

REV	PROJECT ID	DATE	DESCRIPTION	DRWN	DATE	CHKD	DATE	APPV	DATE
				T. GRAVFOED	9/20/21				
FACILITIES ENGINEERING						<small>Copyright © 2021 3M Center St. Paul, MN 55144. This document and the information it contains are 3M property and may not be reproduced or further distributed without 3M permission, or used or disclosed other than for 3M authorized purposes. All rights reserved.</small>			
REGISTRATION STAMP				<small>WALSAU 888</small>		FIGURE 2 CHANNEL/DITCH 3M WAUSAU			
				<small>WALSAU 888</small>		<small>BLDG. NO. 888</small> <small>WISCONSIN</small>			



1 TRENCH SECTION - SECTION 1



2 SWALE SECTION - SECTION 2

ACCESS CODES	DESIGN REFERENCE	NEXT ASSEMBLY				
REV	PROJECT ID	DATE	DESCRIPTION	DRWN	CHKD	DATE
CONSULTANT NAME/LOGO		DATE	DATE	DATE	DATE	DATE
FACILITIES ENGINEERING		DATE	DATE	DATE	DATE	DATE
SCALE				<small>COPYRIGHT © 3M 2001 This document and the information it contains are 3M property and may not be reproduced or further distributed without 3M permission, or used or disclosed other than for 3M authorized purposes. All rights reserved.</small>		TITLE
REGISTRATION STAMP		I.S. CERTIFICATION				FIGURE 3 CONCRETE TRENCH/SWALE 3M WAUSAU
WALSAU		BLDG. NO.		WISCONSIN		REV
DRAWING NUMBER		888		SHEET		

Attachment 2

**Technical Assistance, Environmental Liability Clarification or
Post-Closure Modification Request Form 4400-237**

Notice: Use this form to request a **written response (on agency letterhead)** from the Department of Natural Resources (DNR) regarding technical assistance, a post-closure change to a site, a specialized agreement or liability clarification for Property with known or suspected environmental contamination. A fee will be required as is authorized by s. 292.55, Wis. Stats., and NR 749, Wis. Adm. Code., unless noted in the instructions below. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records law [ss. 19.31 - 19.39, Wis. Stats.].

Definitions

"Property" refers to the subject Property that is perceived to have been or has been impacted by the discharge of hazardous substances.

"Liability Clarification" refers to a written determination by the Department provided in response to a request made on this form. The response clarifies whether a person is or may become liable for the environmental contamination of a Property, as provided in s. 292.55, Wis. Stats.

"Technical Assistance" refers to the Department's assistance or comments on the planning and implementation of an environmental investigation or environmental cleanup on a Property in response to a request made on this form as provided in s. 292.55, Wis. Stats.

"Post-closure modification" refers to changes to Property boundaries and/or continuing obligations for Properties or sites that received closure letters for which continuing obligations have been applied or where contamination remains. Many, but not all, of these sites are included on the GIS Registry layer of RR Sites Map to provide public notice of residual contamination and continuing obligations.

Select the Correct Form

This form should be used to request the following from the DNR:

- Technical Assistance
- Liability Clarification
- Post-Closure Modifications
- Specialized Agreements (tax cancellation, negotiated agreements, etc.)

Do **not** use this form if one of the following applies:

- Request for an **off-site liability exemption or clarification** for Property that has been or is perceived to be contaminated by one or more hazardous substances that originated on another Property containing the source of the contamination. Use DNR's Off-Site Liability Exemption and Liability Clarification Application Form 4400-201.
- Submittal of an Environmental Assessment for the **Lender Liability Exemption**, s 292.21, Wis. Stats., **if no response or review by DNR is requested**. Use the Lender Liability Exemption Environmental Assessment Tracking Form 4400-196.
- Request for an **exemption to develop on a historic fill site** or licensed landfill. Use DNR's Form 4400-226 or 4400-226A.
- **Request for closure** for Property where the investigation and cleanup actions are completed. Use DNR's Case Closure - GIS Registry Form 4400-202.

All forms, publications and additional information are available on the internet at: dnr.wi.gov/topic/Brownfields/Pubs.html.

Instructions

1. Complete sections 1, 2, 6 and 7 for all requests. Be sure to provide adequate and complete information.
2. Select the type of assistance requested: Section 3 for technical assistance or post-closure modifications, Section 4 for a written determination or clarification of environmental liabilities; or Section 5 for a specialized agreement.
3. Include the fee payment that is listed in Section 3, 4, or 5, unless you are a "Voluntary Party" enrolled in the Voluntary Party Liability Exemption Program **and** the questions in Section 2 direct otherwise. Information on to whom and where to send the fee is found in Section 8 of this form.
4. Send the completed request, supporting materials and the fee to the appropriate DNR regional office where the Property is located.

See the map on the last page of this form. A paper copy of the signed form and all reports and supporting materials shall be sent with an electronic copy of the form and supporting materials on a compact disk. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>

The time required for DNR's determination varies depending on the complexity of the site, and the clarity and completeness of the request and supporting documentation.

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 2 of 5

Section 1. Contact and Recipient Information

Requester Information

This is the person requesting technical assistance or a post-closure modification review, that his or her liability be clarified or a specialized agreement and is identified as the requester in Section 7. DNR will address its response letter to this person.

Last Name Meurette	First Mark	MI	Organization/ Business Name 3M Company
Mailing Address 144 Rosecrans Street		City Wausau	State WI
		ZIP Code 54401	
Phone # (include area code) (715) 845-0282	Fax # (include area code)	Email mmeurette@mmm.com	

The requester listed above: (select all that apply)

- Is currently the owner
 Is considering selling the Property
 Is renting or leasing the Property
 Is considering acquiring the Property
 Is a lender with a mortgagee interest in the Property
 Other. Explain the status of the Property with respect to the applicant:

Contact Information (to be contacted with questions about this request)

Select if same as requester

Contact Last Name Meurette	First Mark	MI	Organization/ Business Name 3M Company
Mailing Address 144 Rosecrans Street		City Wausau	State WI
		ZIP Code 54401	
Phone # (include area code) (715) 845-0282	Fax # (include area code)	Email mmeurette@mmm.com	

Environmental Consultant (if applicable)

Contact Last Name Seilheimer	First Trenna	MI	Organization/ Business Name Arcadis U.S., Inc.
Mailing Address 126 North Jefferson Street, Suite 400		City Milwaukee	State WI
		ZIP Code 53202	
Phone # (include area code) (414) 277-6262	Fax # (include area code)	Email trenna.seilheimer@arcadis.com	

Section 2. Property Information

Property Name Rail Lots (former CN/WCL Railroad Track)-Between S 1st Ave and W Thomas St	FID No. (if known)		
BRRTS No. (if known) 02-37-587000	Parcel Identification Number		
Street Address S 1st Ave/E Sherman St, E Sherman St/W Thomas St	City Wausau	State WI	ZIP Code 54401
County Marathon	Municipality where the Property is located <input type="radio"/> City <input type="radio"/> Town <input type="radio"/> Village of Wausau	Property is composed of: <input type="radio"/> Single tax parcel <input checked="" type="radio"/> Multiple tax parcels	Property Size Acres 2

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 3 of 5

1. Is a response needed by a specific date? (e.g., Property closing date) Note: Most requests are completed within 60 days. Please plan accordingly.

No Yes

Date requested by: _____

Reason: _____

2. Is the "Requester" enrolled as a Voluntary Party in the Voluntary Party Liability Exemption (VPLE) program?

No. **Include the fee that is required for your request in Section 3, 4 or 5.**

Yes. **Do not include a separate fee.** This request will be billed separately through the VPLE Program.

Fill out the information in Section 3, 4 or 5 which corresponds with the type of request:

Section 3. Technical Assistance or Post-Closure Modifications;

Section 4. Liability Clarification; or Section 5. Specialized Agreement.

Section 3. Request for Technical Assistance or Post-Closure Modification

Select the type of technical assistance requested: [Numbers in brackets are for WI DNR Use]

- No Further Action Letter (NFA) (Immediate Actions) - NR 708.09, [183] - **Include a fee of \$350.** Use for a written response to an immediate action after a discharge of a hazardous substance occurs. Generally, these are for a one-time spill event.
- Review of Site Investigation Work Plan - NR 716.09, [135] - **Include a fee of \$700.**
- Review of Site Investigation Report - NR 716.15, [137] - **Include a fee of \$1050.**
- Approval of a Site-Specific Soil Cleanup Standard - NR 720.10 or 12, [67] - **Include a fee of \$1050.**
- Review of a Remedial Action Options Report - NR 722.13, [143] - **Include a fee of \$1050.**
- Review of a Remedial Action Design Report - NR 724.09, [148] - **Include a fee of \$1050.**
- Review of a Remedial Action Documentation Report - NR 724.15, [152] - **Include a fee of \$350**
- Review of a Long-term Monitoring Plan - NR 724.17, [25] - **Include a fee of \$425.**
- Review of an Operation and Maintenance Plan - NR 724.13, [192] - **Include a fee of \$425.**

Other Technical Assistance - s. 292.55, Wis. Stats. [97] (For request to build on an abandoned landfill use Form 4400-226)

- Schedule a Technical Assistance Meeting - **Include a fee of \$700.**
- Hazardous Waste Determination - **Include a fee of \$700.**
- Other Technical Assistance - **Include a fee of \$700.** Explain your request in an attachment.

Post-Closure Modifications - NR 727, [181]

- Post-Closure Modifications: Modification to Property boundaries and/or continuing obligations of a closed site or Property; sites may be on the GIS Registry. This also includes removal of a site or Property from the GIS Registry. **Include a fee of \$1050, and:**
 - Include a fee of \$300 for sites with residual soil contamination; and
 - Include a fee of \$350 for sites with residual groundwater contamination, monitoring wells or for vapor intrusion continuing obligations.

Attach a description of the changes you are proposing, and documentation as to why the changes are needed (if the change to a Property, site or continuing obligation will result in revised maps, maintenance plans or photographs, those documents may be submitted later in the approval process, on a case-by-case basis).

Skip Sections 4 and 5 if the technical assistance you are requesting is listed above and complete Sections 6 and 7 of this form Section 6. Other Information Submitted

Identify all materials that are included with this request.

Send both a paper copy of the signed form and all reports and supporting materials, and an electronic copy of the form and all reports, including Environmental Site Assessment Reports, and supporting materials on a compact disk.

Include one copy of any document from any state agency files that you want the Department to review as part of this request. The person submitting this request is responsible for contacting other state agencies to obtain appropriate reports or information.

Phase I Environmental Site Assessment Report - Date: _____

Phase II Environmental Site Assessment Report - Date: _____

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 4 of 5

Legal Description of Property (required for all liability requests and specialized agreements)

Map of the Property (required for all liability requests and specialized agreements)

Analytical results of the following sampled media: Select all that apply and include date of collection.

Groundwater Soil Sediment Other medium - Describe: _____

Date of Collection: _____

A copy of the closure letter and submittal materials

Draft tax cancellation agreement

Draft agreement for assignment of tax foreclosure judgment

Other report(s) or information - Describe: Interim Actions Report, dated September 28, 2021

For Property with newly identified discharges of hazardous substances only: Has a notification of a discharge of a hazardous substance been sent to the DNR as required by s. NR 706.05(1)(b), Wis. Adm. Code?

Yes - Date (if known): _____

No

Note: The Notification for Hazardous Substance Discharge (non-emergency) form is available at:

dnr.wi.gov/files/PDF/forms/4400/4400-225.pdf.

Section 7. Certification by the Person who completed this form

I am the person submitting this request (requester)

I prepared this request for: Mark Meurette

Requester Name

I certify that I am familiar with the information submitted on this request, and that the information on and included with this request is true, accurate and complete to the best of my knowledge. I also certify I have the legal authority and the applicant's permission to make this request.

Trenna Seilheimer
Digitally signed by: Trenna Seilheimer
DN: CN = Trenna Seilheimer email = trenna.seilheimer@arcadis.com C =
US O = Arcadis U.S., Inc. OU = Environment
Date: 2021.09.28 13:16:08 -05'00'

Signature

9/28/2021

Date Signed

Project Manager

Title

(414) 277-6262

Telephone Number (include area code)

Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request

Form 4400-237 (R 12/18)

Page 5 of 5

Section 8. DNR Contacts and Addresses for Request Submittals

Send or deliver one paper copy and one electronic copy on a compact disk of the completed request, supporting materials, and fee to the region where the property is located to the address below. Contact a [DNR regional brownfields specialist](#) with any questions about this form or a specific situation involving a contaminated property. For electronic document submittal requirements see: <http://dnr.wi.gov/files/PDF/pubs/rr/RR690.pdf>.

DNR NORTHERN REGION

Attn: RR Program Assistant
Department of Natural Resources
223 E Steinfest Rd Antigo, WI 54409

DNR NORTHEAST REGION

Attn: RR Program Assistant
Department of Natural Resources
2984 Shawano Avenue
Green Bay WI 54313

DNR SOUTH CENTRAL REGION

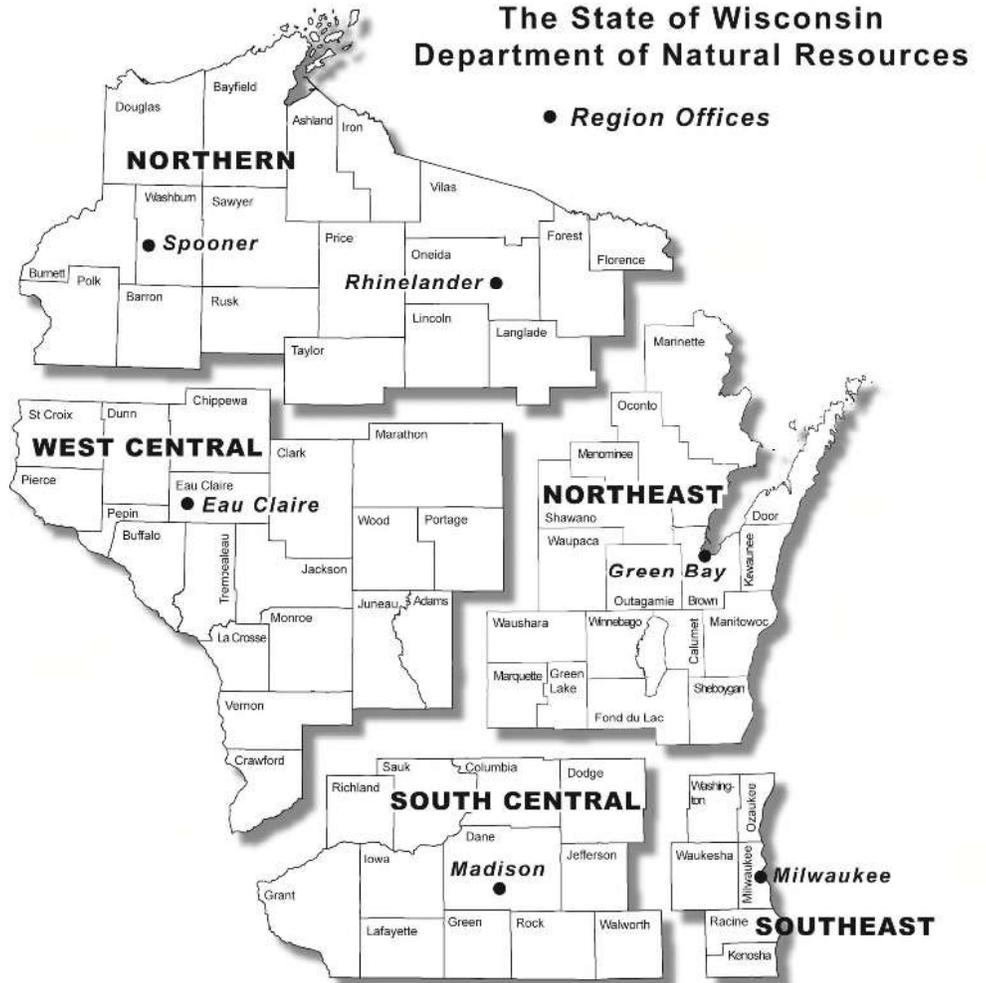
Attn: RR Program Assistant
Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg WI 53711

DNR SOUTHEAST REGION

Attn: RR Program Assistant
Department of Natural Resources
2300 North Martin Luther King Drive
Milwaukee WI 53212

DNR WEST CENTRAL REGION

Attn: RR Program Assistant
Department of Natural Resources
1300 Clairemont Ave.
Eau Claire WI 54702



Note: These are the Remediation and Redevelopment Program's designated regions. Other DNR program regional boundaries may be different.

DNR Use Only			
Date Received	Date Assigned	BRRTS Activity Code	BRRTS No. (if used)
DNR Reviewer		Comments	
Fee Enclosed? <input type="radio"/> Yes <input type="radio"/> No	Fee Amount \$	Date Additional Information Requested	Date Requested for DNR Response Letter
Date Approved	Final Determination		