

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mr. Daniel (OJ) Ojinaga
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Via email:

January 19, 2023

RE: Request for Additional Sampling and Comments on the Vapor Intrusion Pathway
Evaluation; Wausau Groundwater Contamination National Priorities List (NPL) Site

Dear Mr. Ojinaga,

Thank you for the continued work on behalf of the Potentially Responsible Parties (PRPs) for the at the Wausau Groundwater Contamination National Priorities List (NPL) Site (the Site) regarding the required Vapor Intrusion (VI) assessment required by the United States Environmental Protection Agency (EPA) and Wisconsin Department of Natural Resources (WDNR). The VI assessment requires the PRPs to evaluate the potential VI pathway in an effort to better understand the potential for VI risks at and near the Site and to ensure that the remedy is protective of human health and the environment. This letter concerns the required VI assessment.

As background, that work to date includes submission of a VI assessment workplan in 2016 followed by VI sampling to evaluate the potential VI pathway in accordance with the approved workplan and subsequent requirements and discussions and submission of reports such as the Vapor Intrusion (VI) Evaluation Summary Report (dated April 14, 2022) by GHD on behalf of the PRPs.

In accordance with the approved VI assessment workplan, GHD performed VI field work from March 2017 to April 2019, to supplement existing Site data. No formal VI sampling or data evaluation was conducted in 2020 or 2021 due to the suspension of high-risk activities including sub-slab and indoor sampling during the COVID-19 pandemic and the investigation was put on hold until the pandemic concerns lessened. In April 2022, the PRPs submitted the 2021 VI Evaluation Report. After reviewing that information in that report and other information, EPA

and WDNR concluded that additional VI assessment work is necessary. Furthermore, since there was no reason to hold off any longer due to the pandemic concerns, the VI assessment sampling should continue in the 2022-2023 winter season.

For example, on November 4, 2022, on behalf of EPA I sent an email stating: “[b]oth EPA and WI DNR believe that assessment work is not complete based on several factors. Therefore, on behalf of EPA and WDNR, we request at least one more sampling event occur during the 2022-2023 heating season and a follow-up report to be provided as soon as possible so that a determination can be made whether the assessment work is complete and whether the remedy is protective of human health and the environment”. I also stated: “[w]e also request a preferential pathway analysis be done prior to that, if possible, to determine if additional locations need to be assessed for VI. To this end, we request an addendum to the VI workplan be submitted to EPA and WI DNR for approval by December 12, 2022.” I also sent guidance to assist in understanding the requirements.

This decision was discussed during several monthly status meetings and in follow-up emails. For example, on 12/2/2022, on behalf of the PRPs, you sent an email stating that “GHD is working on the preferential pathway analysis and the addendum to the VI Workplan. However, meeting the requested December 12, 2022, submittal date will be challenging. May we please have an extension to have these two documents submitted? I would propose that we get these submitted no later than January 9, 2022 (sic) (since the holidays are in the middle of these dates, we lose 2 weeks with our offices being closed and staff being away on PTO). Please let me know if the proposed submittal date is acceptable. Thank you-”

To that I responded: “I appreciate that the holidays are upon us and will make these requests challenging and I want to be sure the work gets the proper attention it needs. To fully consider this request, I was wondering if you, on behalf of the Group, could at least provide us, by 12/12, a summary of the sampling work that will be proposed in the workplans? That way, EPA and WDNR will know what to expect once we get those workplans and can ask any questions now rather than later.”

On 12/2/2022, you responded that providing a summary of the sampling work shouldn’t be an issue and that you were still working on the preferential pathway analysis to see if we need to add any additional sample locations.

However, on 12/8/2022, rather than submitting information to support the workplan addendum, such as a proposed sampling locations or the results of the preferential pathway analysis, you provided additional information to EPA and WDNR to support the PRPs’ contention that no additional VI assessment sampling is warranted.

On 12/14, I sent an email stating “EPA and DNR still require additional VI sampling at the Site. I will be sending you a letter with the reasons.”

Here is the response. While EPA and WDNR agree that the additional information provided on 12/8/2022 is helpful, that information did not refute the need for additional VI sampling and did not further the requirement of completing the VI assessment. As stated, EPA and WDNR require additional VI sampling to complete the required VI assessment. To support EPA and

WDNR's requirement that additional VI sampling is required, please find the following reasons. 1) no preferential pathway analysis has been conducted or provided; 2) environmental sampling results must include current conditions and be determined to be representative. The last round of VI sampling occurred in 2019. The data up to that point were somewhat inconsistent and fluctuating and did not present a clear pattern or delineation of the VI pathway. In some cases, the winter season represented the worst case and in other cases, the summer season represented the worst case; 3) groundwater, subslab and indoor air results were found to exceed vapor intrusion screening levels (VISLs) at some locations on some dates based on groundwater sampling results during the VI investigation time frame; 4) recent groundwater sampling results indicate that some of the COCs in groundwater have increased since the previous VI sampling; and 5) exceedances of the groundwater VISLs still exist based on recent groundwater sampling information results.

Based on this information, EPA and WDNR, require that the VI workplan be amended and submitted by January 31, 2023, to assess the 2022-2023 winter season at the Site as previously requested.

If you have any questions, do not hesitate to contact me.

Sincerely,

Sheri Bianchin

Sheri L. Bianchin
Remedial Project Manager

Cc: Matthew Thompson, Project Manager, WDNR
Keith Fusinki, PhD, EPA