CITIZENS FOR A CLEAN WAUSAU

Matt Thompson
Department of Natural Resources
1300 W Clairemont Ave
Eau Claire, WI 54701-6127

February 26, 2019

Dear Mr. Thompson,

As I believe you are aware, Citizens for a Clean Wausau (CCW) is a grassroots environmental group in Central Wisconsin. We are comprised of area volunteers. CCW works primarily on issues related to defining the extent and nature of industrial contamination in a specific section of Wausau's southwest side, so that it can and will be remediated.

It is with concern that we write you about Wausau Water Work's (WWW) January 2019 pentachlorophenol – or "penta" – sewer sampling results. A report that Mr. Dave Erickson, Wastewater Superintendent, received from Badger Labs on 1/21/19 and emailed to me personally on 2/14/19, indicated that penta was detected in 4 of the 6 neighborhood manholes tested.[1]

It is our understanding from DNR guidance materials that utility corridors may be contaminant migration pathways and that NR 708.05(3), Wis. Adm. Code, requires immediate actions to halt the migration of hazardous substances when discovered, even if an emergency is not present.[2]

The purpose of this letter is to formally request that the DNR require additional testing of the neighborhood's manholes and utility corridors – in a manner sufficient to define the full extent and nature of the contamination.

Background:

• January 2019 testing detected penta – a probable human carcinogen[3] – in the sewer collection system at multiple locations, including Thomas Street, Emter Street, and Adrian Street.

• The DNR conveyed last week that it needed to know how and why penta entered the manholes in these locations.[4]

• It appears past utility corridor investigations by WAULECO's consultants fail to account for the January 2019 results. And in KER's utility corridor study, certain samples were taken but not analyzed, without apparent explanation.[5]

1 Badger Labs Analytical Report Prepared for Wausau Water Works, Report Dated 1/21/19, Project # 19001453

2 Guidance for Documenting the Investigation of Utility Corridors, RR-649, October 2013

3 ATSDR.com, Toxic Substances Portal, 2/25/19, "The EPA has determined that pentachlorophenol is a probable human carcinogen…"

4 Wausau City Pages (Print Edition), 2/21/19, Page 5, *PCPs found near Thomas Street*

5 Keystone Letter from Ron O'Toole to Mark Johnson of the WDNR, Dated 12/4/89 | Warzyn Letter, Dated August 18, 1993, Attachment: Table 3-2, Utility Corridor Investigation, Soil Boring Analytical Results | Pre-remedial Soil Analytical Table, B-400 Boring Series, Na Footnote: "Not Analyzed"

• A 2008 soil examination of Thomas Street described a boring as having "very loose" soil, and predicted that "trenches elsewhere [on the street] probably have similar pockets of very loose soil," indicating that at points, the soil around certain neighborhood utilities may be more permeable than the surrounding native soil.[6]

• An interceptor through the park and residential area of the neighborhood may intersect an impacted saturated zone.[7]

• In general, certain scenarios could present the potential for utility corridors to provide a direct pathway to a receptor.

• Surface water (the Wisconsin River) is in close proximity and may be impacted by higher than anticipated contaminant concentrations, or may have been already.[8]

• The DNR stated last year that it suspected there may be migration of pollution through unidentified preferential pathways near specific groundwater monitoring wells, and that these pathways could theoretically be contributing to higher contaminant levels at those monitoring wells.[9]

• There is a history of penta manhole contamination in the neighborhood. Such contamination was said to be traced to an interceptor sewer and infiltration in the 1990s, and was reportedly remedied through the implementation of WECO seals.[10]

CCW is Requesting:

1. An expanded investigation with additional testing to ensure that the other manholes and utility corridors within WAULECO's contaminated groundwater footprint are not similarly contaminated -- including the known pathways and piping used for the discharge and transport of WAULECO's effluent to the wastewater plant.

2. Appropriate, thorough testing which includes not only penta, but the additional contaminants that were known to be present in WAULECO's contaminated groundwater (and system effluent[11]). These include, but are not limited to

a. Petroleum VOCs / Aromatics
b. Additional Phenolics
c. Halocarbons
d. Dioxins and Furans

3. That until an appropriate investigation occurs, the DNR restricts any utility activities or work in the neighborhood which may worsen the discharge of this hazardous substance, or that may jeopardize an investigation's ability to collect accurate data.

Thank you for your assistance and the department's prompt attention to this matter. We look forward to working with the DNR to protect our community and its environment.

Sincerely,

Tom Kilian
Spokesperson, Citizens for a Clean Wausau

6 Subsurface Soil Investigation, Proposed Thomas Street Reconstruction, Nummelin Testing Services, Inc., Page 6, "The fill encountered in Boring 10 was very loose and may be backfill that was placed in one of the many utility trenches running below Thomas Street. Utility trenches elsewhere probably have similar pockets of very loose soil."

7 WAULECO SNE Corp Draft Case Closure Documents, 4/14/14, "This sanitary sewer interceptor extends through the park, along the Wisconsin River, On its way from north To south, to the POTW located near Adrian and Emter Streets. The sanitary sewer interceptor intersects the groundwater downgradient of the site and was shown through waste water analyses from several manholes to have caused PCP concentrations in the POTW influent."

8 Wausau Water Works Treatment Facility, WI0025729, EPA Echo, 2018 Effluent Charts, Pentachlorophenol, Discharge Point 001, Effluent Gross

9 2018 Phone Conversation, Tom Kilian and WDNR Hydrogeologist, Portion of Discussion Regarding Levels at MW40

10 WAULECO Incorporated Wausau, Wisconsin Monthly Report May 1997 | Wauleco SNE Corp Draft Case Closure Documents, 4/14/14

11 Final Draft Wauleco, Inc. Wausau Site, Feasibility Study, Dated February 9, 1989, System Effluent Results