



August 16, 2019

Evan Schreiner
Wauleco
1800 North Point Drive
Stevens Point, WI 54481

Subject: Technical Assistance Response: Development and Screening of Alternatives
Wauleco SNE Corp, 125 Rosecrans St., Wausau, Marathon County
BRRTS# 02-37-000006

Dear Mr. Schreiner:

On June 21, 2019 the Department of Natural Resources (DNR) received the above referenced report on Wauleco's behalf by TRC Environmental Corporation. A technical assistance fee of \$700.00 was received per Ch. NR 749 Wis. Adm. Code for this review. Wauleco requested a technical review by the DNR and an indication if additional remedial alternatives should be included in the revised groundwater remedial action options report (RAOR).

TRC's screening and development process makes clear that a singular remedial alternative may not address the variety of challenges at this site. In addition to adding the two alternatives below the DNR requests that Wauleco consider a multi-faceted approach to remediating the site rather than previous approaches where a singular technology has been implemented.

The DNR reviewed the report and requests that Alternative 6, Off-site Pump and Treat System be included in the revised groundwater (RAOR). This alternative was taken out of consideration due to concerns about the method's effectiveness in removing LNAPL; however, off-site pump and treat would likely be effective at treating the dissolved phase groundwater plume which Wauleco is also responsible for addressing.

The DNR also requests that soil excavation be evaluated as a means of source zone reduction. TRC's evaluation of natural source zone depletion specifically states that reduction of source zone residual phase LNAPL would reduce the recharge of dissolved phase product to groundwater. The DNR agrees that a reduction in residual phase product would reduce recharge of dissolved phase product to groundwater, however the rate at which source reduction is presently occurring is not acceptable to the DNR. Further, TRC's evaluation of alternatives indicates a concern for the mobilization and volatilization of residual phase product, manually removing residual phase product greatly reduces these risks as identified by TRC.

Given the concerns demonstrated by the community about the Wauleco site, the DNR believes a more thorough assessment of administrative feasibility for all alternatives is warranted prior to submittal of a final revised groundwater RAOR. Prior to finalizing the revised groundwater RAOR the DNR requests that Wauleco hold a public meeting to explain each strategy proposed for implementation at the site as well as provide the public with an opportunity to provide feedback on such issues as access agreements needed for the installation of off-site remedial systems.

Thank you for continued corporation in working to restore the environment. Please contact me questions regarding this letter by phone at 715-839-3750 or via email MatthewA.Thompson@wisconsin.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Thompson', written over a light blue horizontal line.

Matt Thompson
Hydrogeologist
Remediation and Redevelopment

cc: Bruce Iverson, TRC
Dave Crass, Michael Best