



March 2, 2020

Mr. Evan Schreiner
Wauleco, Inc.
1800 North Point Drive
Stevens Point, WI 54481

Subject: Technical Assistance – Wauleco Wood Waste Burning Soil Sampling
Wauleco SNE Corp., 125 Rosecrans St., Wausau
DNR BRRTS# 02-37-000006

Dear Mr. Schreiner:

On January 31, 2020 the Wisconsin Department of Natural Resources (DNR) received a request from TRC Companies (TRC) on behalf of Wauleco Inc. (Wauleco) for review of the TRC report titled Site Investigation Report, Wood Waste Burning Soil Sampling (SIR). In addition, Wauleco requested DNR comment on its response to the DNR's Wis. Stats. Ch. 292.31(1)(d) waste records request dated January 15, 2019.

Based on a review of documents received by Wauleco, DNR believes Wauleco has provided sufficient information associated with DNR's Wis. Stats. Ch. 292.31(1)(d) request and that no additional action is required by Wauleco to fulfill DNR's request for information.

Waste Records

On March 15, 2019 information provided to DNR included a broad range of operational details and correspondence between Crestline staff and DNR representatives. Stack testing data were included as were plant diagrams showing the location of boilers #1 and #2. A summary of waste streams and a letter dated 10-30-86 from Terry Yonash, SNE Corp. Safety Director stating that passes would no longer be given to employees allowing them to remove scrap wood from DNR property were included as well. Crestline's efforts to reduce the quantity of wood waste burned was detailed in a letter dated December 30, 1972 and was submitted to DNR. The letter included details regarding boiler type and use, approximated wood waste disposal quantities for 1972, and efforts untaken by Crestline to reduce particle emission from the facility. The letter also stated that the efforts taken to reduce particle emission by quantity and quality of burnings, probably brought emissions within legal limits.

The information provided in the submittals demonstrated that wood waste had been used to fuel a boiler at the property and that employees had been permitted to take wood scraps home for personal use. Based on this information DNR determined that site investigation activities should take place.

Site Investigation

The SIR summarized Wauleco's actions taken to investigate areas where particulates emitted from a stack formerly on site may have caused soil contamination. Prior to SIR submittal Wauleco requested DNR concurrence with two (2) site investigation work plans. DNR approved Wauleco's March 15, 2019 *Site Investigation Work Plan* and the April 5, 2019 *Technical Memorandum – Work Plan Addendum No. 1* on April 16, 2019.

The SIR distinguished two soil sample categories: those with expected dioxin and furan contribution from historical operational activities which took place at the Wauleco site (samples O-01 to O-10) and those with expected dioxin and furan contribution from other sources (sample locations N-1 to N-7). A total of 36 surficial soil samples were taken from various points surrounding the Wauleco project site, the samples were analyzed for dioxin and furan compounds.

A review of the soil sample results shows no discernable relationship between expected particulate fallout patterns and dioxin or furan detections. Notable areas of highest dioxin concentrations were along a former railroad corridor and in an alley located upwind and outside the expected particulate fallout area. DNR does not believe these detections were caused by wood waste burning at the Wauleco site. Based on the information provided, DNR concurs with TRC's conclusion that additional soil investigation related to wood waste burning is not needed at this time.

This approval relates and refers only to those conditions described above and to information and data Wauleco submitted to DNR. DNR makes no determination concerning the presence or absence of hazardous substances, other than those identified in the documents and reports that were submitted. In the future, if DNR becomes aware of new information concerning the contaminants referenced above, DNR will evaluate that data at that time to determine if any response actions are required.

Thank you for your continued effort to restore the environment at this site. Please contact me by phone at (715) 839-3750 or by email at matthewa.thompson@wisconsin.gov with questions regarding this letter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Thompson', is written over a light blue circular stamp.

Matt Thompson, Hydrogeologist
Remediation and Redevelopment Program

cc: Bruce Iverson, TRC Companies
Ken Quinn, TRC Companies
David Crass, Michael Best