



October 30, 2020

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

Subject: Department Review of Technical Memorandum Lines of Evidence of PCP Degradation
Wauleco, Inc., 125 Rosecrans Street, Wausau, DNR BRRTS# 02-37-000006

Dear Mr. Schreiner:

The Department of Natural Resources (the Department) has completed its review of the Lines of Evidence of PCP Degradation Technical Memorandum submitted on Wauleco, Inc.'s (Wauleco) behalf by TRC Environmental Corporation. A technical assistance request fee was provided in accordance with Wis. Admin. Code ch. NR 749 for the review of the document and associated meetings to discuss its preparation and the Department's review.

The purpose of the technical memorandum was to provide lines of evidence that pentachlorophenol (PCP) can be biodegraded in the natural environment and to illustrate that biodegradation is the primary mechanism for breakdown of PCP in groundwater at the Wauleco site. In addition, Department questions regarding natural attenuation mechanisms were discussed and evaluated throughout.

Based on review of the technical memorandum, the Department agrees that PCP can be degraded naturally and that PCP concentrations in groundwater across much of site have decreased over time. Select profiles appear to demonstrate stability, others do not. Appropriately, biodegradation rates were not calculated for the centerline and stagnation zone profiles using the Buscheck and Alcantar equation. These profile lines represent the core of the groundwater plume and a significant portion of the total extent of contamination. While other natural processes can be accounted for using the Buscheck and Alcantar equation at the peripheries of the plume, they cannot be accounted for through the center line of the primary plume. Site specific testing at the Wauleco site may provide evidence that adequate biological activity exists to reduce contaminant mass in an effective and timely manner.

The Department conceptually agrees with the findings and conclusions of this technical memorandum, however; additional field studies are necessary to support the conclusion that biodegradation is the primary natural attenuation mechanism for the central portion of the groundwater plume.

For questions or comments regarding this determination please contact Matt Thompson at (715) 492-2304 or by email at matthewa.thompson@wisconsin.gov. The Department looks forward to continued discussion regarding remedial approaches for this site. Thank you for your continued efforts to restore the environment.



Hydrogeologist

Remediation and Redevelopment

cc: Bruce Iverson, TRC
Ken Quinn, TRC
Dave Rozeboom, DNR