State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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April 16, 2019

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

Subject:

Aerial Deposition Site Investigation Work Plan Approval and Comments

Wauleco SNE Corp, 125 Rosecrans Street, Wausau

DNR BRRTS# 02-37-000006

Dear Mr. Schreiner:

The Wisconsin Department of Natural Resources (the department) has received the March 15, 2019 *Site Investigation Work Plan* (SIWP) and the April 5, 2019 *Technical Memorandum – Work Plan Addendum No. 1* (Addendum) for the Wauleco SNE Corp (Wauleco) response action site. The reports and \$700 review fee were submitted on behalf of Wauleco by TRC Environmental Corporation with a request for DNR review and concurrence. Based on review of the documents and previously submitted information, the department provides the following approvals and comments related to the SIWP and Addendum for this site.

The department approves the SIWP scope of work for aerial deposition modeling methodology as proposed in section 5.2 of the SIWP. The department understands that TRC will use AERMOD, version 18081, to identify areas where particulates would most likely be deposited and that air dispersion model results will be provided to the department within 30 days after receipt of this letter. The input parameters proposed by TRC are reflective of historic permit applications and stack test data therefore the department concurs with the parameters listed in Tables 1 and 2 of the Addendum.

TRC has proposed four versions of the air dispersion model to be run. Held constant during each will be an emission rate of 1 gram/sec from the stack. The remaining model inputs are understood to be listed in Tables 1 and 2 of the Addendum. The department has reviewed the four versions of the air dispersion model and concurs with their use.

The SIWP proposes that a background conditions assessment follow air dispersion modeling after which data gaps in soil sample data will be addressed. Given the variety of industries that have operated in the vicinity of the Wauleco project site, the department agrees that a background assessment is warranted. Concurrent with the background assessment, Wauleco should assess areas shown by the model to likely have been impacted by particulates from burning of wood waste. Please include proposed non-background sample locations in the technical memorandum referred to in section 5.5 of the SIWP.

The department appreciates the efforts you are taking to investigate potential contamination at the Wauleco site. Please do not hesitate to contact me at (715) 839-3750 or <a href="matthewa.thompson@wisconsin.gov">matthewa.thompson@wisconsin.gov</a> if you have any questions regarding this SIWP approval.



Sincerely,

Matt Thompson, Hydrogeologist Remediation and Redevelopment Program

cc:

Bruce Iverson, TRC

Ken Quinn, TRC

Dave Crass, Michael Best