Thompson, Matthew A - DNR

From:Thompson, Matthew A - DNRSent:Wednesday, October 21, 2020 12:07 PMTo:Crass, David A (57921)Cc:Schreiner Evan; Bruce Iverson - TRC Solutions, Inc. (biverson@trccompanies.com)Subject:RE: Wauleco, Inc. Site -- Response to DNR

David,

Thank you for the correspondence regarding these contaminants. Given what we know about the site to date, due in large part to the extensive records review performed by Wauleco Inc., the investigation at the Wauleco site does not need to be expanded to include the contaminants listed in the Department's letter concerning emerging contaminants letter. The Department appreciates your prompt response to this matter.

Best, Matt

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Matt Thompson

Hydrogeologist – Remediation and Redevelopment Wisconsin Department of Natural Resources 1300 W. Clairemont Ave., Eau Claire, WI 54701 Office: 715-492-2304 matthewa.thompson@wisconsin.gov



From: Crass, David A (57921) <DACrass@michaelbest.com>
Sent: Thursday, October 15, 2020 9:06 AM
To: Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>
Cc: Schreiner Evan <Evan.Schreiner@sentry.com>; Bruce Iverson - TRC Solutions, Inc. (biverson@trccompanies.com)
<biverson@trccompanies.com>
Subject: Wauleco, Inc. Site -- Response to DNR

Matt: Hope you are well. Please see the attached correspondence on behalf of Wauleco in response to the Department's recent state-wide letter.

Regards,

David A. Crass

Partner, Energy & Environmental Practice Group Industry Group Co-Chair, Agribusiness, Food & Beverage E <u>dacrass@michaelbest.com</u> T 202.595.7921 | M 608.332.5314 | F 202.347.1819



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October 15, 2020

VIA EMAIL (matthewa.thompson@wisconsin.gov)

Matt Thompson Wisconsin Department of Natural Resources DNR Service Center 1300 W Clairemont Eau Claire WI 54701

Re: Evaluation of Emerging Contaminants Wauleco Site 125 Rosecrans Street, Wausau, WI BRRTS #02-37000006; FID #737063800

Dear Mr. Thompson:

On behalf of Wauleco, Inc. (Wauleco) we write to respond to the Department's August 17, 2020 correspondence concerning the evaluation of emerging contaminants in site investigation activities. The letter specifically addressed emerging contaminants including perfluoroalkyl and polyfluoroalkyl substances (PFAS) as well as 1,4-dioxane.

In response to the Department's correspondence, Wauleco conducted a thorough review of its historic documents. As you know, the facility was essentially fully demolished by 1993, save for the portion of the facility that houses the groundwater remediation systems and has been capped and maintained since that time with a chip seal cap.

Our review did not reveal any evidence of the use of chemical fire suppressants or other materials likely to contain PFAS. Additionally, we found no evidence concerning the use of 1,1, TCA at the site which, according to the US EPA fact sheet¹, is the concern related to 1-4 dioxane.

In summary, based on the results of the review of historic documents, we have concluded that the facility was not a plausible source of the emerging contaminants listed above. Wauleco concludes that no further investigation is necessary regarding these compounds at this time. Thank you for your attention to this matter.

¹ U.S. EPA, January 2014. Technical Fact Sheet 1,4-Dioxane. EPA 505-F-14-011



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Very truly yours ,

MICHAEL BEST & FRIEDRICH LLP

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David A. Crass

cc. Wauleco, Inc.

TRC