

Thompson, Matthew A - DNR

From: Nathan Miller <Nathan.Miller@ci.wausau.wi.us>
Sent: Friday, August 21, 2020 12:54 PM
To: Thompson, Matthew A - DNR; Rozeboom, David B - DNR
Subject: FW: Ongoing Discharge of Pentachlorophenol By Wauleco Into the Wisconsin River Via Groundwater in the Subsurface

Attachments: 20160831_82_ROAR_Not_Appr - Highlighted by TK.pdf;
Thompson_DNR_Estimating_PCP_Concentration_Discharge_of_Plume_Into_River.pdf;
Surface Water Acute Toxicity - Email Attachment.pdf; 1.7
_WAULECO_River_Discharge_Attempted_Closure.pdf;
DNR_Correspondence_Discharge_Permit.pdf;
conceptual_river_barrier_note_monitoring_well_10a_concentrations.JPG

Importance: High

Hello Matt and David,

I have received the attached records from Alderperson Tom Killian. Perhaps it would be good if we can set up a phone conference to discuss these and if Wauleco is discharging pollutants that are making their way to a navigable water without a permit.

Nathan Miller

From: Tom Kilian
Sent: Friday, August 21, 2020 12:48 PM
To: Nathan Miller <Nathan.Miller@ci.wausau.wi.us>
Subject: Re: Ongoing Discharge of Pentachlorophenol By Wauleco Into the Wisconsin River Via Groundwater in the Subsurface

Good Afternoon Nathan,

There are likely hundreds of relevant pages from DNR records pertaining to the ongoing discharge of penta-contaminated groundwater into the Wisconsin River via its plume (not from system effluent). Before I take the time to compile those for your department, please let me know if the attached are sufficient to begin establishing that there is in fact a discharge of penta into the river via the groundwater in the subsurface, and that this discharge of contaminated groundwater has been formally traced to the WAULECO site which is located at points only 145 yards west of the river into which its site's contamination discharges. The attached records should also help demonstrate that the DNR is using TRC's monitoring wells near the river to estimate the concentrations of penta entering the river through the discharge -- I would guess they are likely using monitoring well 10A for some of these concentration estimates.

I recommend starting with a review of the DNR's rejection of WAULECO's Remedial Action Option Report (RAOR) dated August 31, 2016. I have highlighted some passages for your review that relate to the river, as well as statements which explicitly cover the ongoing discharge of PCP-contaminated groundwater into the Wisconsin River. For example, please see the DNR's Technical Conclusion #1 on page 5 of the PDF -- I would note that this discharge has nothing to do with the system's effluent or the wastewater plant scenarios you described, but the contaminated groundwater plume stemming from the WAULECO site which terminates

at and discharges into the river:

"While the department's Bureau of Water Quality has made a determination that a WPDES permit will not be necessary to address the groundwater discharges that are entering the Wisconsin River, it must be clarified that this determination does not mean the department finds the ongoing discharge of approximately 6,000 parts per billion of PCP to the Wisconsin River to be acceptable under other state laws. A determination that a WPDES permit is not necessary does not constitute department approval of the discharge; it does not negate the obligations of the responsible party to comply with other applicable laws, and should not be construed to be a determination that no further remedial action is necessary due to dilution into the receiving water body. "

The original record can be found here on the DNR BRRTS website:

https://dnr.wi.gov/botw/DownloadBlobFile.do?docSeqNo=74074&docName=20160831_82_ROAR_Not_Appr.pdf

I have attached an email from the DNR's Mr. Matt Thompson dated March 23, 2018 in which he explains what discharge he is referring to the 2016 RAOR rejection and how the concentration of PCP entering the river is estimated (it is estimated through a monitoring well right near the river, as detailed above):

"The 6,000ppb number comes from groundwater monitoring well data provided by Wauleco to the DNR. This number represents the concentration of PCP in the groundwater at a specific monitoring point, in this case a monitoring well near the river. There is no pipe discharging PCP into the river, rather the subsurface area where contaminated groundwater flows into the river is our concern."

I can also provide maps, if useful, of the monitoring wells and associated PCP concentrations, along with maps detailing instream waste concentration estimates. Additionally and anecdotally, as a layperson, I would find it confusing for WAULECO and its consultants to be composing conceptual models of river barriers (attached) if the contaminated groundwater was not and has not been entering the river.

I do not want to inundate you, so please let me know if the attached are enough to begin establishing that there is a discharge of contaminated groundwater from the WAULECO site into the Wisconsin River in my district. I have plenty of other supporting data that I can share, but want to make sure this type of contaminated groundwater "discharge" is pertinent to the recent court case and potential permits before spending time doing so.

Thank you for your assistance,
Tom

From: Tom Kilian
Sent: Thursday, August 20, 2020 5:32 PM
To: Nathan Miller
Subject: Ongoing Discharge of Pentachlorophenol By Wauleco Into the Wisconsin River Via Groundwater in the Subsurface

Good Evening Nathan,

Nice speaking with you this afternoon.

Today, if I am not mistaken, you conveyed to me that the DNR had recently stated to you that there was no ongoing discharge of Wauleco's pentachlorophenol into the Wisconsin River other than through the responsible party's system effluent which is sent through the sewer to our wastewater plant, is treated there again, and then discharged into the river.

After we spoke, I reviewed DNR records for the Wauleco site, particularly in relation to the PCP-contaminated groundwater plume entering the Wisconsin River through the subsurface (a different route than you and the DNR described). And after reviewing the DNR's records, I can confirm that that department's statement you shared with me -- if I am understanding it correctly -- is inaccurate or false.

I would like to schedule an appointment with you in the near future to come in and review some of the DNR's documents together which appear to directly contradict the department's position as you described it to me.

Please let me know what may be some convenient day and time options.

Thank you,
Tom

=====

Statement of Confidentiality

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed.

If you are not the intended recipient of this email, any use, dissemination, forwarding, printing, or copying of this email is prohibited. Please notify the sender of this email of the error and delete the email.

=====

1.7 Wisconsin River Discharge

The natural, non-pumping groundwater flow direction from the Wauleco Site is to the east, with discharge to the Wisconsin River. This discharge occurs as a diffuse, non-point discharge to the river.

The potential requirement for a WPDES permit for discharge of groundwater with PCP to the Wisconsin River was explored with WDNR. As suggested by the WDNR closure committee, TRC contacted the WDNR's Water Quality Bureau and was referred to Ms. Kari Fleming, an environmental toxicologist with the Bureau. A summary of exchanges between Ms. Fleming, TRC, and Lisa Gutknecht (the Wauleco project manager for the WDNR Bureau of Remediation and Redevelopment) is included in Appendix E. Communications included presenting the site conditions and potential discharge concentrations to the Bureau of Water Quality. After consultations with WDNR legal staff and wastewater managers, the Bureau of Water Quality determined that no WPDES permit is required for the diffuse, non-point discharge of groundwater containing residual PCP because the Department "do not suspect that there is potential for exceedances of water quality standards".

Therefore, discharge of groundwater from Wauleco to the Wisconsin River is acceptable to the WDNR and does not require a WPDES permit.

1.8 Conceptual Site Model

The Conceptual Site Model, describing the principal processes that have and/or continue to occur at the Site, is illustrated in Figure 7 and includes the following components:

- Releases from the dip tank/dry room and to some extent from the PCP USTs has resulted in the migration of free phase product through the unsaturated zone soils to groundwater and down the groundwater gradient. The current extent of residual phase product (also the historical largest extent of free phase product) is shown in Figure 1.
- Operation of the groundwater remediation system from 1992 to present (23 years) and the enhanced product recovery system from 1999 to 2011 (12 years) has removed approximately 147,000 gallons of free phase product and has virtually eliminated the presence of free phase product in 2011.
- Residual phase product, the immobile remains of the free phase product, is present both on-Site and off-Site, with an estimated 70% of the volume on-Site and 30% off-Site.
- Natural biodegradation of PCP in groundwater is occurring both beneath the residual phase product and downgradient of the residual phase product.

- Mineral spirits constituents, naphthalene and 1,2,4-trimethylbenzene are present in groundwater associated with the residual phase product, but degrade to below their respective PALs in a short distance downgradient.
- Groundwater flow through the Site naturally migrates to the east, towards the Wisconsin River.
- There are no completed pathways to potential receptors between the Wauleco property and the Wisconsin River.
- The WDNR Bureau of Water Quality concluded that there is not the potential for exceedances of surface water quality standards in the Wisconsin River, and no WPDES permit is required for the natural discharge of groundwater from the Wauleco project Site to the river. Therefore, discharge of groundwater from the Wauleco project Site to the river is acceptable to the WDNR.

In summary, at the time of case closure, the only potential receptor is the Wisconsin River as groundwater discharges to the river. However, the WDNR concluded that there is not the potential for exceedances of surface water quality standards in the Wisconsin River, and no WPDES permit is required for discharge of groundwater from the Wauleco project Site to the river.

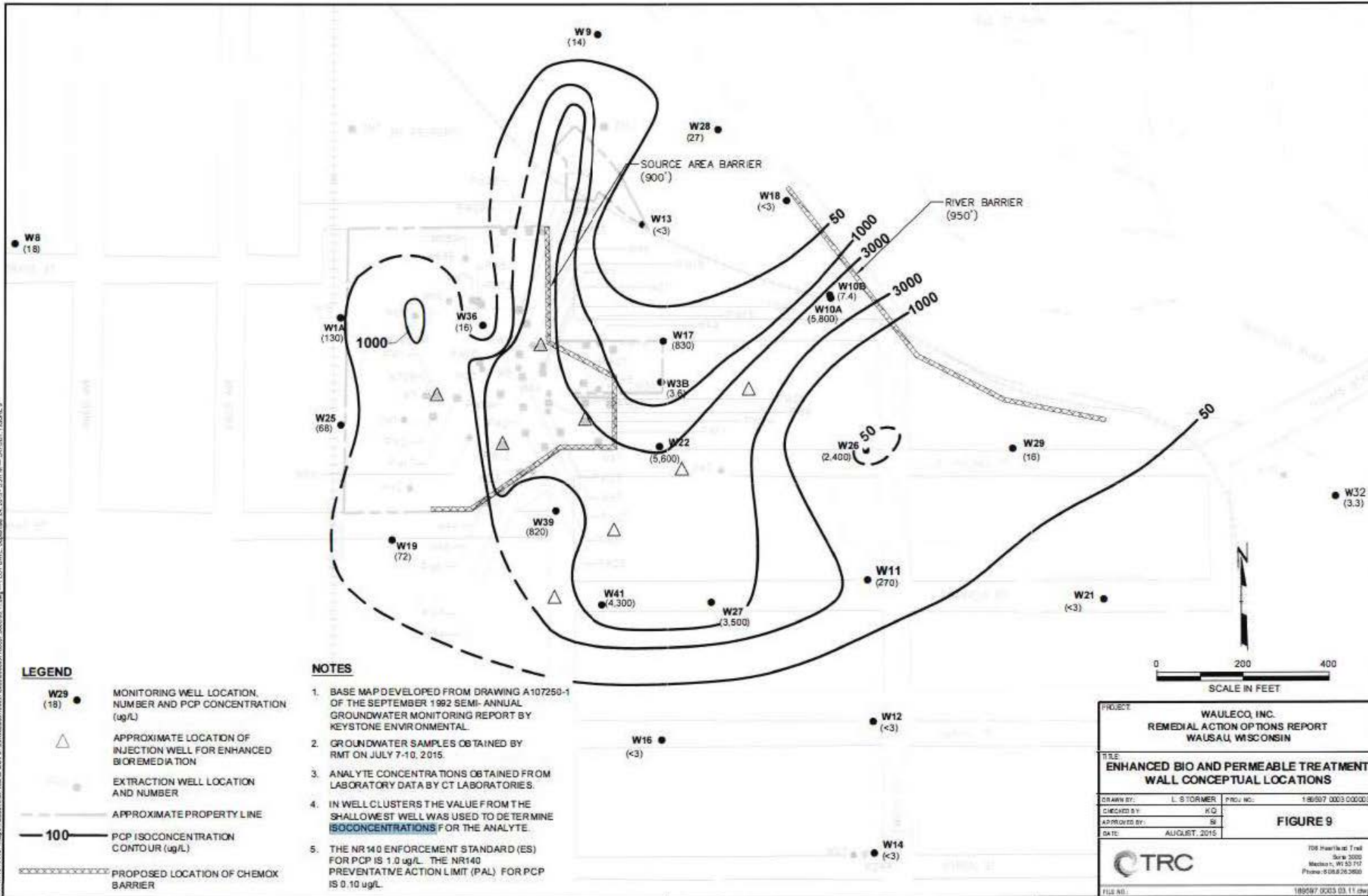
1.9 Expected Final Closure Actions

The remedial actions being contemplated within this RAOR are to evaluate remedial action options to determine whether achieving the interim remedial action objectives of reducing the mass of residual phase product and to reduce the groundwater PCP concentrations are practicable. If these goals are practicable and a remedy is successfully implemented, there will be residual phase product remaining on and off the Site that will contribute to PCP in groundwater. Management of the remaining residual phase product and the COCs in groundwater will require additional actions to achieve closure of the Site. For the purposes of preparing cost estimates for the remedial action options, after implementation of the selected remedy, the following actions will be required:

- Eight rounds of groundwater monitoring for the COCs to demonstrate that the groundwater plume is stable or reducing.
- The process to prepare the Site to be put on the groundwater and soil GIS registries will be completed, including: appropriate property owner notifications, public notices, and public information meetings, as needed.
- Preparation of a closure request and review of closure request by the WDNR closure committee.

Because these actions are common to all alternatives presented in this RAOR, the cost of these actions are not included in this analysis. The timing of when to begin the 8 rounds of groundwater monitoring is dependent on the monitoring results associated with each alternative (refer to Time of Operation, and Monitoring Plan discussions in Section 2.1).

C:\PROJECTS\15857\15857.dwg - PLOT DATE: September 24, 2015 - 3:19PM - LAYOUT: FIGURE 9



Appendix E

Correspondence on Wisconsin River Discharge

Appendix E-1
Kari Fleming Email Dated August 13, 2014

From: Gutknecht, Lisa A - DNR <Lisa.Gutknecht@wisconsin.gov>
Sent: Wednesday, August 13, 2014 10:09 AM
To: Iverson, Bruce
Subject: FW: Wauleco: In-Stream Waste Concentration Calculation For WDNR

Bruce,

Below is the response from Kari Fleming regarding your in-stream waste concentration calculation that you submitted to her. As we discussed please provide me a response to our program's request that Wauleco conduct river sampling such as the WET test. Thanks. Lisa

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Lisa Gutknecht
Phone: (715) 359-6514
Lisa.Gutknecht@wisconsin.gov

From: Gutknecht, Lisa A - DNR
Sent: Wednesday, August 13, 2014 8:08 AM
To: Fleming, Kari L - DNR
Subject: RE: Wauleco: In-Stream Waste Concentration Calculation For WDNR

Kari,

I went over the calculations with TRC last week and don't have any problems with their groundwater flow estimates. Thank you for taking the time to walk all of us through the process. You've been very helpful and responsive to our request. I've learned something new about the wastewater program! Thanks. Lisa

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Lisa Gutknecht
Phone: (715) 359-6514
Lisa.Gutknecht@wisconsin.gov

From: Fleming, Kari L - DNR
Sent: Wednesday, August 13, 2014 8:00 AM
To: Gutknecht, Lisa A - DNR
Cc: Fleming, Kari L - DNR
Subject: RE: Wauleco: In-Stream Waste Concentration Calculation For WDNR

Lisa, do you have any problems with the groundwater flow estimates that they present in their report? Groundwater flow dynamics are not something that I normally deal with, so I will rely on you to determine whether or not the flow they used in their calculations seems appropriate or not.

If you agree that the groundwater flow estimate that they used is correct, then I don't have any concerns about toxicity due to this discharge. An instream waste concentration (IWC) < 1.0% would not even really be measurable in a WET test. They are correct in asserting that we normally do not ask for effluent toxicity tests when the stream flow to effluent flow (Qs:Qe) ratio is > 1000:1. They have even underestimated that ratio,

since we do not use $\frac{1}{4}$ of the Qs for that comparison (i.e., the Qs : Qe would be 12,500 : 1, not 3,126 : 1). What this all means is that the dilution available in the receiving water at the location where the groundwater is thought to enter the river is so high that the risk for impacts due to acute or chronic toxicity are extremely low.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kari Fleming

Phone: (608) 267-7663

Kari.Fleming@wisconsin.gov

From: Iverson, Bruce [<mailto:BIverson@trcsolutions.com>]
Sent: Thursday, August 07, 2014 1:31 PM
To: Fleming, Kari L - DNR
Cc: Gutknecht, Lisa A - DNR; Quinn, Kenneth
Subject: Wauleco: In-Stream Waste Concentration Calculation For WDNR

Kari, attached for your review is the In-Stream Waste Concentration (IWC) calculation for the Wauleco project site located in Wausau, WI. Sheets 2 to 5, and the drawings are associated with calculating the groundwater flow from Wauleco (i.e., the Qe). Ken and I are available to discuss our approach to calculate the Qe with you if that would be a benefit to you. If so, please let me know and I will coordinate a conference call.

As you will see, the IWC as a percentage is 0.032%, and the Qs:Qe Ratio is 3,126:1. Please let us know if you have any questions or comments on this IWC calculation. Based on the results of this IWC, we are also interested in your opinion on the need to perform toxicity testing.

If you have any questions, please contact us. Thanks, Bruce

Bruce Iverson, P.E. (WI)
Senior Project Manager



708 Heartland Trail, Suite 3000, Madison, WI 53717
T: 608.826.3644 | F: 608.826.3941 | C: 608.235.4963

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [Flickr](#) | www.trcsolutions.com

Appendix E-2
Kari Fleming Email Dated October 7, 2014

From: Gutknecht, Lisa A - DNR <Lisa.Gutknecht@wisconsin.gov>
Sent: Thursday, October 30, 2014 11:34 AM
To: Iverson, Bruce
Subject: FW: Wauleco site

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Lisa Gutknecht
Phone: (715) 359-6514
Lisa.Gutknecht@wisconsin.gov

From: Fleming, Kari L - DNR
Sent: Tuesday, October 07, 2014 2:21 PM
To: Gutknecht, Lisa A - DNR
Cc: Fleming, Kari L - DNR
Subject: Wauleco site

I have had discussions with legal staff and wastewater managers, regarding the need for surface water quality-based limits on the groundwater plume from the Wauleco site. Given the dilution present in the area where the plume is thought to reach the Wisconsin River, and the fact that this is likely to be a more diffuse/non-point source discharge point, we do not suspect that there is potential for exceedance of water quality standards. (You may recall we estimated a 12,000:1 stream flow to "effluent" flow ratio at that location.) Based on the discussions that I have had with our staff, the wastewater program does not feel that a WPDES permit is required in a situation like this.

Does your program need anything more from us in order to close out this remediation site? Or is our opinion that there is no reasonable potential for surface water quality standard exceedances enough?

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kari Fleming
Environmental Toxicologist – Bureau of Water Quality
Whole Effluent (WET), Ambient and Sediment Toxicity Testing
Watershed Assessment, Restoration & Protection (WARP) - TMDL Implementation
316b - Cooling Water Intake Structures

Wisconsin Department of Natural Resources
101 S. Webster St, Madison WI
Phone: (608) 267-7663
Kari.Fleming@wisconsin.gov



Appendix E-3
Kari Fleming Email Dated November 3, 2014

From: Fleming, Kari L - DNR <Kari.Fleming@wisconsin.gov>
Sent: Monday, November 03, 2014 7:59 AM
To: Iverson, Bruce
Cc: Gutknecht, Lisa A - DNR; Quinn, Kenneth; Fleming, Kari L - DNR
Subject: RE: Wauleco site - NR 105 Surface Water Acute Toxicity Criteria Applicability

Essentially, yes. It is our opinion that NR 105 criteria (both acute and chronic) are not likely to be exceeded, therefore no WPDES permit or NR 105-based limits are necessary.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kari Fleming
Phone: (608) 267-7663
Kari.Fleming@wisconsin.gov

From: Iverson, Bruce [<mailto:BIverson@trcsolutions.com>]
Sent: Thursday, October 30, 2014 6:11 PM
To: Fleming, Kari L - DNR
Cc: Gutknecht, Lisa A - DNR; Quinn, Kenneth
Subject: Wauleco site - NR 105 Surface Water Acute Toxicity Criteria Applicability

Kari, thank you for the response. Based on your discussions with WDNR staff and your email, it is our understanding that NR 105 Surface Water Acute Toxicity Criteria would not be applicable; is our understanding correct? Again, thank you for all your input on this matter. Bruce

Bruce Iverson, P.E. (WI)
Senior Project Manager



708 Heartland Trail, Suite 3000, Madison, WI 53717
T: 608.826.3644 | F: 608.826.3941 | C: 608.235.4963

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [Flickr](#) | www.trcsolutions.com

From: Gutknecht, Lisa A - DNR [<mailto:Lisa.Gutknecht@wisconsin.gov>]
Sent: Thursday, October 30, 2014 11:34 AM
To: Iverson, Bruce
Subject: FW: Wauleco site

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Lisa Gutknecht
Phone: (715) 359-6514
Lisa.Gutknecht@wisconsin.gov

From: Fleming, Kari L - DNR
Sent: Tuesday, October 07, 2014 2:21 PM
To: Gutknecht, Lisa A - DNR
Cc: Fleming, Kari L - DNR
Subject: Wauleco site

I have had discussions with legal staff and wastewater managers, regarding the need for surface water quality-based limits on the groundwater plume from the Wauleco site. Given the dilution present in the area where the plume is thought to reach the Wisconsin River, and the fact that this is likely to be a more diffuse/non-point source discharge point, we do not suspect that there is potential for exceedance of water quality standards. (You may recall we estimated a 12,000:1 stream flow to "effluent" flow ratio at that location.) Based on the discussions that I have had with our staff, the wastewater program does not feel that a WPDES permit is required in a situation like this.

Does your program need anything more from us in order to close out this remediation site? Or is our opinion that there is no reasonable potential for surface water quality standard exceedances enough?

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kari Fleming

Environmental Toxicologist – Bureau of Water Quality

Whole Effluent (WET), Ambient and Sediment Toxicity Testing

Watershed Assessment, Restoration & Protection (WARP) - TMDL Implementation

316b - Cooling Water Intake Structures

Wisconsin Department of Natural Resources

101 S. Webster St, Madison WI

Phone: (608) 267-7663

Kari.Fleming@wisconsin.gov



This e-mail is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this e-mail in error, please tell us immediately by return e-mail and delete the document. No recipient may use the information in this e-mail in violation of any civil or criminal statute. Sentry disclaims all liability for any unauthorized uses of this e-mail or its contents. Sentry accepts no liability or responsibility for any damage caused by any virus transmitted with this e-mail.

Thompson, Matthew A - DNR

From: Fleming, Kari L - DNR
Sent: Monday, November 03, 2014 7:59 AM
To: Iverson, Bruce
Cc: Gutknecht, Lisa A - DNR; Quinn, Kenneth; Fleming, Kari L - DNR
Subject: RE: Wauleco site - NR 105 Surface Water Acute Toxicity Criteria Applicability

Follow Up Flag: Follow up
Flag Status: Flagged

Essentially, yes. It is our opinion that NR 105 criteria (both acute and chronic) are not likely to be exceeded, therefore no WPDES permit or NR 105-based limits are necessary.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kari Fleming

Phone: (608) 267-7663

Kari.Fleming@wisconsin.gov

From: Iverson, Bruce [<mailto:BIverson@trcsolutions.com>]
Sent: Thursday, October 30, 2014 6:11 PM
To: Fleming, Kari L - DNR
Cc: Gutknecht, Lisa A - DNR; Quinn, Kenneth
Subject: Wauleco site - NR 105 Surface Water Acute Toxicity Criteria Applicability

Kari, thank you for the response. Based on your discussions with WDNR staff and your email, it is our understanding that NR 105 Surface Water Acute Toxicity Criteria would not be applicable; is our understanding correct? Again, thank you for all your input on this matter. Bruce

Bruce Iverson, P.E. (WI)
Senior Project Manager



708 Heartland Trail, Suite 3000, Madison, WI 53717
T: 608.826.3644 | F: 608.826.3941 | C: 608.235.4963

[LinkedIn](#) | [Twitter](#) | [Blog](#) | [Flickr](#) | www.trcsolutions.com

From: Gutknecht, Lisa A - DNR [<mailto:Lisa.Gutknecht@wisconsin.gov>]
Sent: Thursday, October 30, 2014 11:34 AM
To: Iverson, Bruce
Subject: FW: Wauleco site

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Lisa Gutknecht

Phone: (715) 359-6514

Lisa.Gutknecht@wisconsin.gov

From: Fleming, Kari L - DNR
Sent: Tuesday, October 07, 2014 2:21 PM
To: Gutknecht, Lisa A - DNR
Cc: Fleming, Kari L - DNR
Subject: Wauleco site

I have had discussions with legal staff and wastewater managers, regarding the need for surface water quality-based limits on the groundwater plume from the Wauleco site. Given the dilution present in the area where the plume is thought to reach the Wisconsin River, and the fact that this is likely to be a more diffuse/non-point source discharge point, we do not suspect that there is potential for exceedance of water quality standards. (You may recall we estimated a 12,000:1 stream flow to "effluent" flow ratio at that location.) Based on the discussions that I have had with our staff, the wastewater program does not feel that a WPDES permit is required in a situation like this.

Does your program need anything more from us in order to close out this remediation site? Or is our opinion that there is no reasonable potential for surface water quality standard exceedances enough?

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Kari Fleming

Environmental Toxicologist – Bureau of Water Quality

Whole Effluent (WET), Ambient and Sediment Toxicity Testing

Watershed Assessment, Restoration & Protection (WARP) - TMDL Implementation

316b - Cooling Water Intake Structures

Wisconsin Department of Natural Resources

101 S. Webster St, Madison WI

Phone: (608) 267-7663

Kari.Fleming@wisconsin.gov



This e-mail is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this e-mail in error, please tell us immediately by return e-mail and delete the document. No recipient may use the information in this e-mail in violation of any civil or criminal statute. Sentry disclaims all liability for any unauthorized uses of this e-mail or its contents. Sentry accepts no liability or responsibility for any damage caused by any virus transmitted with this e-mail.

[Print](#) | [Close Window](#)

Subject: RE: More questions

From: "Thompson, Matthew A - DNR" <MatthewA.Thompson@wisconsin.gov>

Date: Fri, Mar 23, 2018 9:54 am

To: Patrick Peckham <Patrick.Peckham@ci.wausau.wi.us>, Tom Kilian <tkilian@kilianimc.com>

Attach: Surface Water Acute Toxicity.pdf

Pat and Tom-

The 6,000ppb number comes from groundwater monitoring well data provided by Wauleco to the DNR. This number represents the concentration of PCP in the groundwater at a specific monitoring point, in this case a monitoring well near the river. There is no pipe discharging PCP into the river, rather the subsurface area where contaminated groundwater flows into the river is our concern.

I've attached an e-mail from our Bureau of Water Quality that explains their determination of why a Wisconsin Pollutant Discharge Elimination System (WPDES) permit is not required for this site.

Tom- I'll send my RCL spreadsheets over this afternoon.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Matt Thompson

Office: 715-839-3750

MatthewA.Thompson@wisconsin.gov

From: Patrick Peckham [mailto:Patrick.Peckham@ci.wausau.wi.us]

Sent: Thursday, March 22, 2018 2:23 PM

To: Thompson, Matthew A - DNR <MatthewA.Thompson@wisconsin.gov>

Cc: Tom Kilian <tkilian@kilianimc.com>

Subject: More questions

Matt,

Tom K. has provided me with a copy of the August 2016 DNR determination that monitored natural attenuation would not be acceptable for the Wauleco site.

Of particular interest is the part where it says groundwater being discharged into the river as a result of the contamination at the Wauleco site has a PCP concentration of 6,000 parts per billion.

Could you explain how that was determined?

There's no pipe where it drips out, right?

This is seeping from a general area into the river below the surface?

How is this OK? Is it that the totals entering the river are so small that even though the concentration going in is 6,000 ppb, it is so quickly diluted that it's not a risk to public health?

Pat P.

=====

Statement of Confidentiality

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed.
If you are not the intended recipient of this email, any use, dissemination, forwarding, printing, or copying of this email is prohibited. Please notify the sender of this email of the error and delete the email.

=====

Copyright © 2003-2020. All rights reserved.