



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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January 11, 2001

Mr. Al Toma
Fort James Corporation
PO Box 89
Deerfield, IL 6015-0089

Subject: Fort James Ashland Mill Site – Former 20,000-gal USTs/Buried Industrial Waste, 2301 E Lakeshore Dr, Ashland, WI, BRRTS # 03-02-185897

Dear Mr. Toma:

The Department of Natural Resources provided a notice to you that the degree and extent of petroleum and fuel oil contamination at the above-named site was required to be investigated and remediated. We have since been informed that the required investigation and remediation has been accomplished.

On December 5, 2000, the above-named site was reviewed by the Northern Region Closeout Committee for a determination as to whether or not the case qualified for close out under ch. NR 726, Wis. Adm. Code.

Based on the investigative and remedial documentation provided to the Department, it appears that the petroleum and fuel oil contamination at the above-named site has been remediated in compliance with the requirements of chs. NR 700 to 724, Wis. Adm. Code. Therefore, the Department considers the case "closed," having determined that no further action is necessary at the site at this time. However, the case may be reopened pursuant to s. NR 726.09, Wis. Adm. Code, if additional information regarding site conditions indicates that contamination on or from the site poses a threat to public health, safety or welfare or the environment.

The most recent groundwater monitoring data at this site indicates an exceedance of the NR 140 preventive action limit (PAL) for arsenic but compliance with the NR 140 enforcement standard (ES). The Department may grant an exemption pursuant to s.NR140.28(2)(b), Wis. Adm. Code, if the following criteria are met:

- 1) The measured or anticipated increase in the concentration of arsenic will be minimized to the extent technically and economically feasible.
- 2) Compliance with the PAL is either not technically or economically feasible.



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- 3) The ES for arsenic will not be attained or exceeded at the point of standards application.
- 4) Any existing or projected increase in the concentration of arsenic above the background concentration does not present a threat to public health or welfare.

The Department believes that the above criteria have been or will be met because of the remediation that has occurred at this site. Therefore, pursuant to NR 140.28, an exemption for the arsenic PALs is granted to monitoring well # MW- 03. This letter serves as your exemption. At this time, the Department is not requiring any further investigation or other action concerning this specific site.

Please note that this case closure is contingent upon proper documentation of proper abandonment of the monitoring wells on site. If monitoring wells remain at this site, please provide the documentation that this action has been completed, or have your consultant do so. Please complete Form 3300-5B and send it to my attention at the above address.

If you have any additional information which was not formerly provided to the Department, and which you feel would significantly impact this closure decision, you may submit that information for our re-evaluation of case closure.

Solid waste was discovered during a phase 2 investigation of the mill site performed in June of 1998. The solid waste consisted of polyethylene material, ash, cinders, and paper mill sludge (filter cake). Pursuant to a plan you submitted to the Department on August 20, 1998, you chose to address this area under the provisions of chapter NR 500 and, the Department has reviewed the remediation of this area under that chapter. You elected to excavate the solid waste from the north and west sides of the mill building and dispose of the material at your approved Gingles Landfill under a plan modification. The excavation was subsequently backfilled with clean soil.

Based on the information provided to the Department, it appears that the identified solid waste issues were adequately addressed. At this time, no further action is required in this regard. Should further information identify other solid waste issues required further action, the Department reserves the right to seek such action from appropriate parties.

If you have any questions, please call me at 715-365-8990.

Sincerely,
NORTHERN REGION



Janet Kazda
Case Closeout Committee

→ cc: File
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