



April 23, 2020

Mr. John Butz
Bay Towel, Inc.
PO Box 12115
Green Bay, WI 54307-2115

SUBJECT: Contained-Out Determination for Direct-Haul Soil Intervals
Bay Towel – Solvent Investigation, 501 S. Adams Street, Green Bay, WI
BRRTS # 02-05-237064

Dear Mr. Butz,

On April 20, 2020, the Department of Natural Resources (DNR) received *Technical Assistance, Environmental Liability Clarification or Post-Closure Modification Request (Form 4400-237)* and the associated \$700.00 review fee. This submittal was prepared by Fehr Graham, and submitted to the DNR on behalf of Bay Towel, Inc.

This waste determination is based on the above-referenced submittal, along with previously submitted reports and analytical data, for the Bay Towel -Solvent Investigation site. This letter serves as your notification that the 2,300 tons of chlorinated solvent contaminated soil from the 7- to 14-foot and 25- to 30-foot intervals of the main excavation, and the 0- to 10-foot interval of the southeast corner excavation, can be direct-hauled and disposed of at a subtitle D landfill. These intervals of soil can be handled/disposed of as non-hazardous waste based on the following:

- It does not exhibit a hazardous characteristic;
- It meets the land disposal restrictions of less than 60 milligrams/kilogram (mg/kg) for tetrachloroethylene (PCE), trichloroethylene (TCE) and vinyl chloride (VC); and
- It meets the contained-out values for PCE (153 mg/kg), TCE (8.8 mg/kg) and VC (2 mg/kg) as outlined in the DNR publication titled "Contained-Out" Values for PCE, TCE and Vinyl Chloride, December 2013, Pub-RR-969.

If you have any questions regarding the content of this letter, please contact me at 920-366-5685 or via email at josie.schultz@wisconsin.gov.

Sincerely,

Josie Schultz
Hydrogeologist
Remediation & Redevelopment Program

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