



June 1, 2015

Mr. Michael Moore
Georgia-Pacific Consumer Products LP
1919 South Broadway
P.O. Box 19130
Green Bay, Wisconsin 54307

Subject: Approval for Management of Contaminated Soil under Chapter NR 718 Wis. Adm. Code
Generator Property: Georgia-Pacific Broadway Mill, 1919 S. Broadway Street, Green Bay
FID # 405032870
WDNR Sites: Former Buth Oil Facility, BRRTS# 02-05-563707
Wisconsin-Michigan Auto Salvage, BRRTS# 02-05-000627

Dear Mr. Moore:

On March 19, 2015, Georgia-Pacific (GP) submitted a request for approval from the Wisconsin Department of Natural Resources (Department) under s. NR 718.12 Wis. Adm. Code, to allow disposal of excavated contaminated soil from the GP Broadway Mill Parking lots (Lots 1-C and 3) to another location (Soil Relocation Area) on the GP Broadway Mill property (See Figure 5; South Broadway Street Proposed Paving Plan 2015 - Soil Staging and Relocation Areas, 5/20/2015). The Department also received the \$700 technical assistance fee for providing review and response, in accordance with s. NR 749.04(1), Wis. Adm. Code.

On May 6, 2015, a meeting was held between GP, GEI Consultants, Inc. (GEI), and the Department to discuss and clarify soil management plans, s. NR 718.12 Wis. Adm. Code management of contaminated soil exemption, and need for a temporary storage exemption per s. NR 718.05(2), Wis. Adm. Code. As a follow-up to the meeting the Department requested that GP provide additional information in an addendum.

The exemptions outlined in the letter are based on the following submittals:

- March 17, 2015, Soil Management Plan (SMP) for Phase 1 of the Broadway Mill Parking Lot Resurfacing Project prepared by GEI
- May 21, 2015, GP submitted Addendum 1 to the Soil Management Plan for the GP Broadway Mill Parking Lot Resurfacing Project (ASMP) prepared by GEI.

Summary of Proposed Soil Management Activities

The SMP addresses plans for management of soil during the parking lot resurfacing activities at the GP Broadway Mill, 1919 S. Broadway Street in Green Bay, Wisconsin. The resurfacing activities will be completed in two phases. Phase 1, May and June 2015, will include Lot 1-C and Lot 3 (See Figure 5; South Broadway Street Proposed Paving Plan 2015 - Soil Staging and Relocation Areas, 5/20/2015). Phase 1 includes two soil management areas, Area A and Area B, (See Figure 4; South Broadway Street Proposed Paving Plan 2015 - Soil Management Areas, 5/20/2015).

Phase 2 of the resurfacing activities is scheduled to be completed later in 2015 and will consist of resurfacing activities in the area of the former WI-MI Auto Salvage site (BRRTS# 02-05-000627) (See Figure 2A; Area of Impacted Soil Remediation and Approximate Extent of Soil Impacts). The soil in the area of the former WI-MI Auto Salvage site will be managed similar to the soil handling approach for soil management of Phase I Area A of Lot 3 as discussed in the SMP and covered under the s. NR 718 Wis. Admin. Code exceptions outlined in this letter. This would include soil disposal at a licensed landfill if chlorinated volatile organic compounds (CVOCs) are detected or if volatile organic compounds (VOCs) and/or metals are reported at concentrations higher than previously documented in Phase I Area A of Lot 3.

Prior to Phase 2 resurfacing of the WI-MI Auto Salvage site area, a Post Closure Continuing Obligation Request shall also be submitted to the Department along with the appropriate fees (Cap Modification or Removal of a site or property from the database fee \$1050 and Database fees of \$300 and \$350) for review and approval. Once the resurfacing has been completed a Post Closure Modification Final Documentation Report shall be submitted to the Department for the WI-MI Auto Salvage site area, including a revised maintenance plan, photos, and any appropriate maps. It will also be necessary to document, in a report, the Phase I resurfacing activities in Areas A and B. It is acceptable to summarize the Phase I and Phase II resurfacing activities in one report.

As outlined in the SMP, soils will be excavated during Phase I and Phase II parking lot resurfacing activities to a depth of approximately 18 inches below ground surface (bgs). The installation of several storm sewer catch basins and laterals, to depths up to 6 feet bgs, are also proposed. Soils planned for excavation include both contaminated soil and clean fill. Approximately 1,700 cubic yards (cyd) of excavated contaminated soil originating from the resurfacing areas is proposed to be temporarily stockpiled in one of two soil staging areas. At a later time, the stockpiled soil will be placed in one of two relocation areas – Clarifiers 3 and 4, located on the southern portion of the property, or a relocation area approximately 1,600 feet east of Lot 1-C and Lot 3. Soil staging and soil relocation areas are shown on Figure 5 (South Broadway Street Proposed Paving Plan 2015 - Soil Staging and Relocation Areas, 5/20/2015). Soil will be handled in accordance with s. NR 718.12, Wis. Adm. Code, which exempts the disposal location from solid waste requirements in ch. 289, Stats. and ch.s NR 500 to 538, Wis. Adm. Code.

Although not discussed in the SMP and ASMP, placing excess material in the form of berms in accordance with the Shoreline Beautification Project was also discussed at the May 6th meeting. When the contaminated soils have been placed in the clarifier relocation area, documentation of the soil placement in the clarifier shall be submitted to the Department. When the contaminated soils have been placed in the Shoreline Beautification Berm, documentation and the as-built shall be submitted to the Department.

Storage of Excavated Contaminated Soil: s.NR718.05(2) Wis. Adm. Code

Information provided in the SMP indicates that excavated contaminated soils being staged comply with the storage and locational requirements of s. NR 718.05(2), Wis. Adm. Code so that staged soil:

- will not exceed 2,500 cyd,
- will not be stored for more than six months,
- will be stored on-site on an impermeable surface, covered, anchored and bermed,
- will be posted with proper signs,
- will not be stored within 100 feet of a wetland or critical habitat area, and
- will not be stored within 100 feet of any on-site water supply well or 300 feet of any off-site water supply well.

The Department must be notified of any contaminated soils are stored for more than 90 days. The Department should also be notified of any significant changes and/or delays in project activities.

Grant of Exemption to s. NR 718.05(2)(a)

In consideration of the low level petroleum soil contaminant concentrations in Lot 3 and the former WI-MI Auto Salvage site and compliance with the storage requirements discussed above, the Department grants an exemption to the location criteria of:

- s. 718.05(2)(a)1. and will allow temporary stockpiles of contaminated soil within a floodplain, and
- s. 718.05(2)(a)3. and will allow placement of temporary stockpiles within 300 feet of the Fox River.

Management of Contaminated Soil: s. NR 718.12 (1)(c) Wis. Adm. Code

Information provided in the SMP and the ASMP indicates that the soil relocation areas comply with the locational criteria of s. NR 718.12 (1)(c), Wis. Admin. Code, so that soil will not be placed or replaced in the following areas:

- Within 100 feet of a wetland or critical habitat area.
- Within 100 feet of any on-site water supply well or 300 feet of any off-site water supply well
- Within 3 feet of the high groundwater level.
- At a depth greater than the depth of the original excavation from which the contaminated soil was removed.
- Where the contaminated soil poses a threat to public health, safety or welfare or the environment.

Grant of exemption to s. NR 718.12(1)(c)

In consideration of petroleum soil contaminant concentrations within Lot 3 and the former WI-MI Site and the proposed capping of the soil relocation area as discussed in the SMP, the Department grants an exemption to the location criteria of:

- s. 718.12(1)(c)1. and will allow placement of contaminated soil within a floodplain.
- s. 718.12(1)(c)3. and will allow placement of contaminated soil within 300 feet of the Fox River.

Soil Characterization

Soil proposed for excavation from the resurfacing activities is contaminated with VOCs, CVOCs, and metals. Samples have been collected for analysis of all contaminants previously detected or expected to be present based on past land use and from areas most likely to contain residual soil contamination. As described in the SMP and ASMP suspect soil will be sampled at a frequency of one sample per 100 cyd for the first 600 cyd (with a minimum of 2 samples collected). For volumes of soil that exceed 600 cyd, one sample will be collected for each additional 300 cyd of soil. The sampling criteria of s. NR 718.12(1)(e), Wis. Admin. Code, have been met.

The following information has been provided in the SMP and ASMP:

Generator Site Information

Property Owner/Responsible Party:
Georgia-Pacific Corporation
Attention: Mr. Michael Moore, Environmental Engineer

June 1, 2015
Mr. Michael Moore
Approval for Management of Contaminated Soil Under Chapter NR 718 Wis. Adm. Code
Former Buth Oil Facility – BRRTS # 02-05-563707

1919 S. Broadway, Green Bay, WI 54307-9130
Phone: 920-438-4081
Email: michael.moore@gapac.com

Project Location:

Parking lots Lot 1-C, Lot 3, and former WI-MI Auto Salvage site
1919 S. Broadway, Green Bay, Wisconsin
NE1/4, SE1/4, Section 2, T23N, R20E
Wisconsin Transverse Mercator (WTM) coordinates: X: 676200; Y: 448730 (former WI-MI site)

Estimated Volume of Impacted Soil:

Based on the information reviewed by the Department, the estimated volume of contaminated soil to be managed is 1,700 cyd.

Consultant:

GEI Consultants, Inc.
Attention: Roger Miller or Paul Garvey
3159 Voyager Drive
Green Bay, WI 54311
Phone: 920-455-8200

Proposed Resurfacing & Soil Management Schedule:

- Lot 1-C, May 2015. Unless contaminated soil are identified during resurfacing activities a soil management plan is not need for the clean soils in Lot 1-C.
- Lot 3, June 2015.
- WI-MI Auto Salvage site, late 2015.
- Decommissioning of clarifier, summer of 2016.

Analytical Results:

Soil and groundwater results from Lot 3 and the former WI-MI Site are summarized in the SMP and ASMP. Additional soil and groundwater information for the WI-MI Site can also be found in the Department's closed case file (BRRTS #02-05-000627). Contaminants of concern include VOCs, CVOCs, and metals.

Justification that Placement of Contaminated Soils Meet NR 726.13(1)(b) 1 through 5:

Sufficient information has been provided in the SMP and ASMP to justify that the reuse of contaminated soils will meet the requirements of s. NR 726.13(1)(b) 1 through 5. As discussed in the SMP, impacted soil placed in the soil relocations areas will be capped with an engineered cover and subject to continuing obligations (i.e., cap maintenance plan).

Conditional Department Approval

Based on review of the above-referenced documents, and the requirements of ss. NR 718.05 and 718.12, Wis. Adm. Code, the Department approves the SMP and ASMP for relocation of up to 2,500 cyd of contaminated soil that will be excavated during the resurfacing activities of Lot 1-C, Lot 3, and the former WI-MI Site to the soil relocation areas as identified in the SMP and ASMP. Approval is conditioned upon compliance with the following:

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Former Butth Oil Facility – BRRTS # 02-05-563707

Conditions of Approval

Soil excavation from the resurfacing activities and placement at the soil staging and/or relocations areas shall be completed within 2 years of the effective date of this letter unless a written extension of this condition is obtained from the Department. It is the Department's understanding that the clarifier will not be taken off-line and used as a relocation area until the summer of 2016.

GP shall manage excavated material in conformance with the SMP and ASMP and shall notify the Department within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the Department for the generating site. The material must be segregated and tested to determine the proper disposal. GP shall manage soil in accordance with the proposed handling options based on soil analytical results as summarized in the SMP.

GP shall not relocate more than 2,500 cyd of excavated contaminated soil from the resurfacing activities to the staging and/or relocation areas unless written approval is granted by Department.

GP shall submit to the Department, documentation of excavation and soil staging and relocation activities within 30 days of completing the parking lot resurfacing activities. The report shall include summary of sample results, appropriate figures, phot documentation, description of field activities and observations, total volume of material transported, soil relocations areas, and a cap maintenance plan if warranted.

GP must comply with all applicable statutes and administrative rules, including erosion control and storm water management requirements, as a result of the proposed construction activities at the site.

The Department reserves the right to require the submittal of additional information or to modify or revoke this soil management approval if GP fails to comply with the requirements of the SMP, as proposed. The Department also retains its right to modify or revoke this approval if circumstances or conditions change, or if new information is found which would warrant modification or revocation of this approval.

If you have any questions regarding this approval decision, please contact me in writing at the letterhead address, by calling 920-662-5165, or by email at Richard.Joslin@wisconsin.gov.

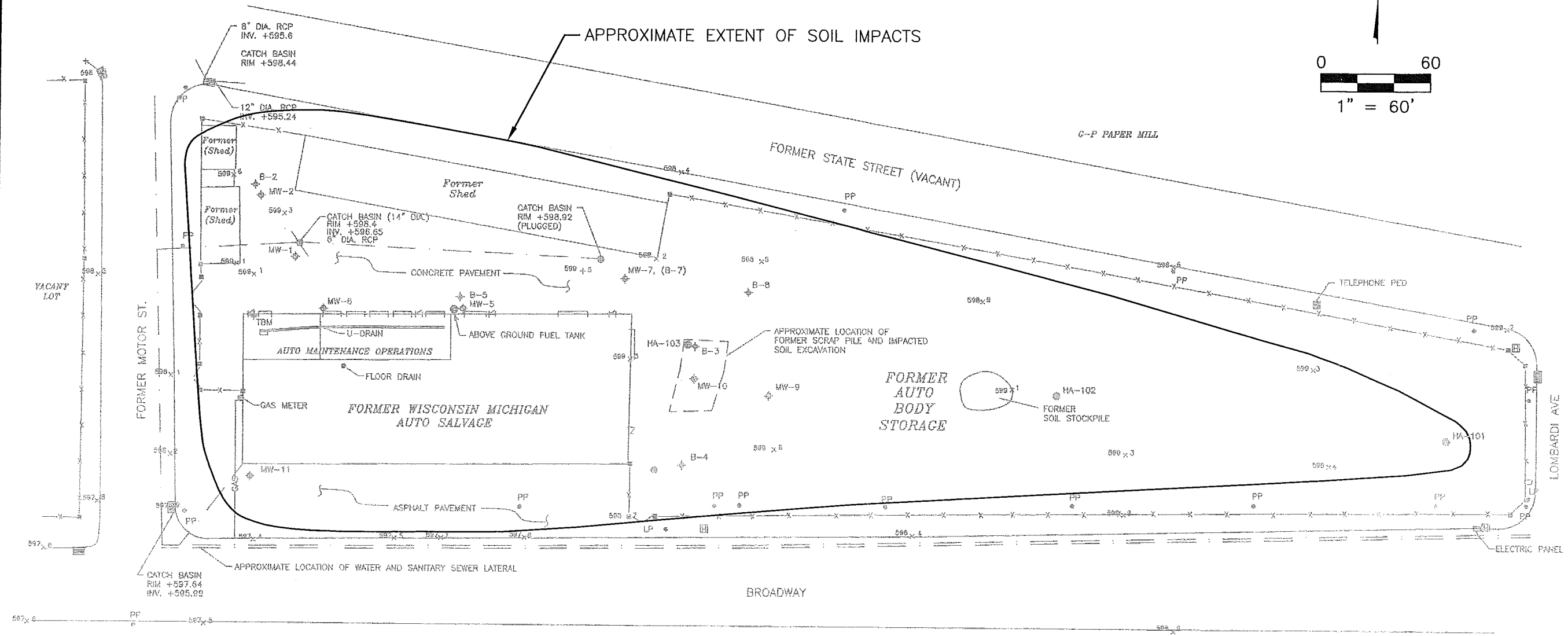
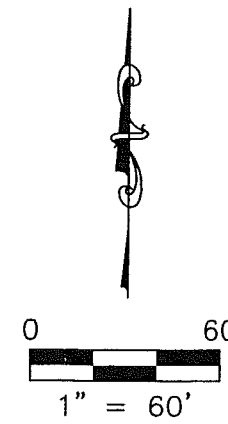
Sincerely,



Richard R. Joslin
Hydrogeologist
Remediation and Redevelopment Program

cc: Roger Miller - GEI Consultants, Inc. (email only)

Attachments: Figure 2A - Area of Impacted Soil Remediation and Approximate Extent of Soil Impacts
Figure 5 - South Broadway Street Proposed Paving Plan 2015 - Soil Staging and Relocation Areas, 5/20/2015
Figure 4 - South Broadway Street Proposed Paving Plan 2015 - Soil Management Areas, 5/20/2015



NOTES

1. SITE SURVEYED BY STS CONSULTANTS ON 3-10-93
2. LOCATIONS OF WATER, SANITARY SEWER, AND STORM SEWER LINES APPROXIMATED FROM CITY OF GREEN BAY ENGINEERING DEPARTMENT MAPS FROM 1973.
3. UTILITIES MARKED WITH DASHED LINES ARE APPROXIMATE LOCATIONS.
4. THE AREA LOCATED BETWEEN LOMBARDI AVENUE, BROADWAY AVENUE, FORMER MOTOR STREET, AND FORMER STATE STREET IS VACANT AND CURRENTLY UTILIZED AS AN ASPHALT PARKING LOT.

LEGEND

- MONITORING WELL
- SOIL BORING
- HAND AUGER LOCATION
- GROUND SURFACE SPOT ELEVATION
- UTILITY POLE
- STEEL OR METAL FENCE
- SERVICE DOOR
- OVER HEAD DOOR
- FENCE GATE
- STORM WATER CATCH BASIN
- APPROXIMATE LOCATION OF CATCH BASIN
- FIRE HYDRANT
- LIGHT POLE
- TRAFFIC SIGNAL
- TEMP. BENCH MARK

AREA OF IMPACT SOIL REMEDIATION AND APPROXIMATE EXTENT OF SOIL IMPACTS

**FORMER WISCONSIN - MICHIGAN AUTO SALVAGE
GEORGIA PACIFIC CORPORATION
GREEN BAY, WISCONSIN**

Drawn: RLD 3/30/2009

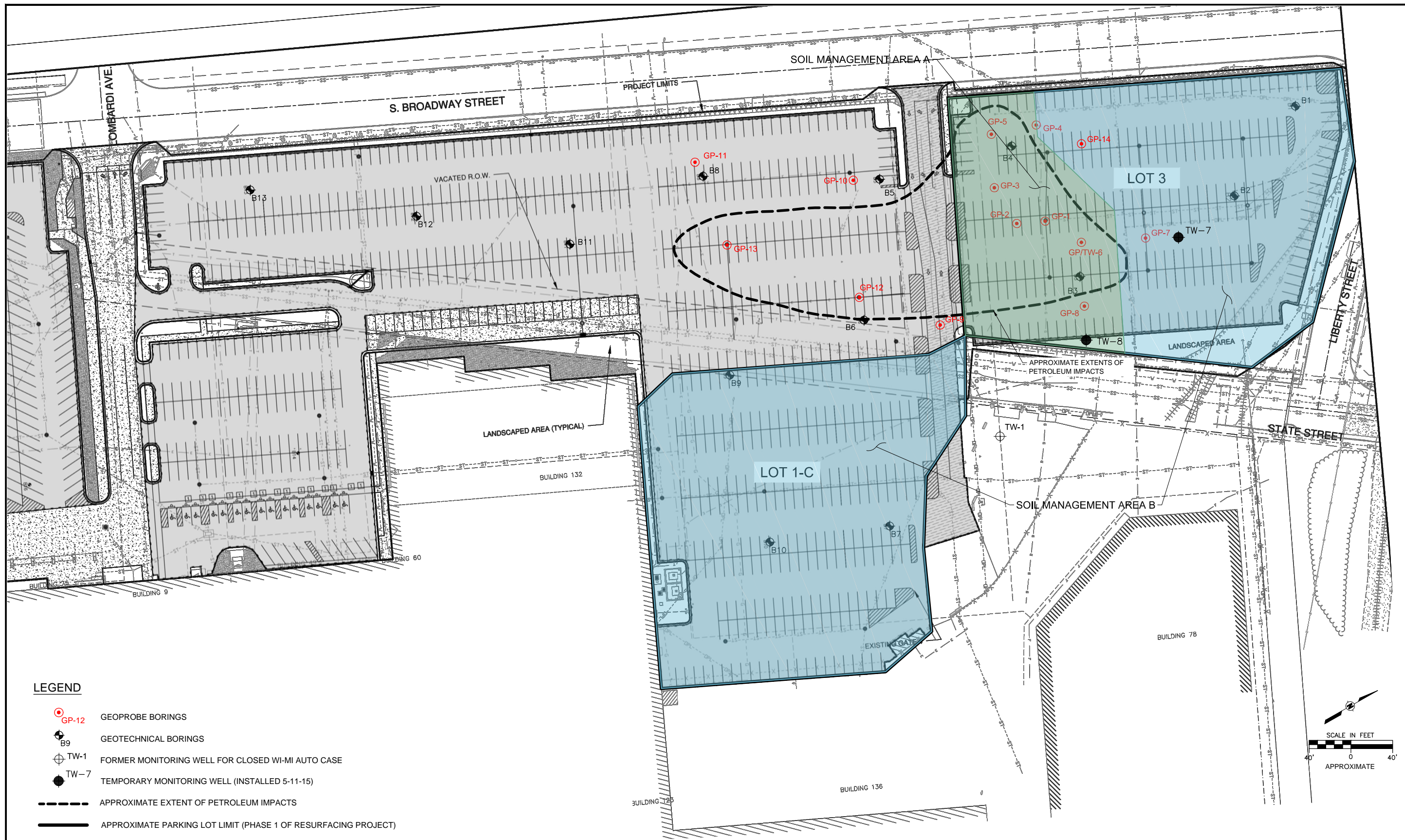
Checked: MWM 3/30/2009

Approved: RAM 3/30/2009









PROJECT NUMBER 200800962

FIGURE NUMBER 2A

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LEGEND

-  GEOPROBE BORINGS
-  GEOTECHNICAL BORINGS
-  FORMER MONITORING WELL FOR CLOSED WI-MI AUTO CASE
-  TEMPORARY MONITORING WELL (INSTALLED 5-11-15)
-  APPROXIMATE EXTENT OF PETROLEUM IMPACTS
-  APPROXIMATE PARKING LOT LIMIT (PHASE 1 OF RESURFACING PROJECT)
-  SOIL MANAGEMENT AREA A
-  SOIL MANAGEMENT AREA B

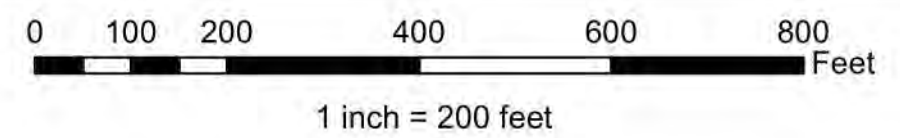
Attention:				
NO.	DATE	ISSUE/REVISION	APP	
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Designed: RAM
 Checked: RAM
 Drawn: CEF
 Submittal Date: 5/20/2015



SOUTH BROADWAY STREET
 PROPOSED PAVING PLAN - 2015
 SOIL MANAGEMENT AREAS

FIG. NO.
 04



Coordinate System: NAD 1983 HARN WISCRS Brown County Feet

Attention:			
NO.	DATE	ISSUE/REVISION	APP
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Designed:	RAM
Checked:	RAM
Drawn:	CEF
Submittal Date:	5/20/2015

GEI  **consultants**
 3159 Voyager Drive
 Green Bay, Wisconsin 54311
 920-455-8200

GP-BROADWAY MILL PARKING LOT
 GEI Project 1506470

SOUTH BROADWAY STREET
 PROPOSED PAVING PLAN - 2015
 SOIL STAGING AND RELOCATION AREAS

FIG. NO.
 05