

**From:** James, Andrew G - DNR  
**Sent:** Wednesday, February 3, 2021 2:27 PM  
**To:** Miller, Roger  
**Cc:** Michael.Moore@gapac.com; Killian, Paul  
**Subject:** Soil Management - Buth Oil Facility (Former) (BRRTS # 02-05-563707) & Wisconsin/Michigan Auto Salvage (BRRTS # 02-05-000627)

Roger,

Thank you for submitting documentation outlining the parking lot reconstruction activities at the Georgia Pacific (GP) Mill property as related to the two above-listed R&R Sites. Documentation was required to outline soil management from the above Sites in response to the reconstruction of the parking lot located at 1919 South Broadway Avenue, Green Bay, WI. On March 25, 2015, GEI on behalf of GP submitted a request for Technical Assistance (TA) along with the required \$700.00 review fee. The TA consisted of a Soil Management Plan (SMP) and subsequently an Addendum to Soil Management Plan (ASMP) was also submitted for WDNR review. Ultimately, provisions were adopted for the handling and reuse of contaminated and non-contaminated soil on GP Mill property, or, for this soil to be disposed of at a licensed landfill. Subsequent environmental analysis determined that a majority of the contaminated soil existed at depths exceeding the depth of excavation needed for parking lot reconstruction. Analytical results show all soil that was excavated and not disposed of at a licensed landfill was below the established Residual Contaminant Levels (RCLs). Excess soil (containing chlorinated and petroleum compounds) from Lot 6 (the location of Wisconsin/Michigan Auto Salvage, BRRTS # 02-05-000627) and petroleum impacted soil above RCLs excavated at the Buth Oil Facility (Former) Site (BRRTS # 02-05-563707) was disposed of at a licensed landfill and not reused in berms on GP Mill property. A total of 129.37 ton of contaminated soil was disposed of at a licensed landfill. A total of 1,500 cubic yards (cy) of excess soil assumed to be impacted (below RCLs) from the Buth Oil Facility (Former) Site was relocated within berms on GP Mill property. Finally, a total of 5,500 cy of soil deemed to be clean, was used to envelope the 1,500 cy of soil assumed to be impacted with petroleum compounds below RCLs, in the relocation berms on GP Mill property. As all of the soil managed on GP Mill property is below RCLs, a cap maintenance plan is not required for the bermed areas. Thus, the parking lot reconstruction activities have been completed at both Sites and the required final documentation outlining the movement and management of this soil is complete.

Please be aware if contaminated soil from the bermed areas is excavated in the future, the property owner at the time of excavation must sample and analyze the excavated soil. If sampling confirms that contamination is present, the property owner at the time of excavation will need to determine if the material is considered solid waste and ensure that any storage, treatment or disposal complies with applicable standards and rules. Contaminated soil may be managed under Wis. Admin. Code ch. NR 718 with prior DNR approval.

If you have any questions or concerns please do not hesitate to reach out.

Sincerely,  
Andy James

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Andy James

Hydrogeologist Remediation & Redevelopment Program

Wisconsin Department of Natural Resources

2984 Shawano Avenue

Green Bay, WI 54313

Cell: 715-527-0114

[Andrew.James@wisconsin.gov](mailto:Andrew.James@wisconsin.gov)



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**From:** Miller, Roger <[rmiller@geiconsultants.com](mailto:rmiller@geiconsultants.com)>

**Sent:** Wednesday, January 13, 2021 1:27 PM

**To:** James, Andrew G - DNR <[andrew.james@wisconsin.gov](mailto:andrew.james@wisconsin.gov)>

**Cc:** [Michael.Moore@gapac.com](mailto:Michael.Moore@gapac.com); Killian, Paul <[pkillian@geiconsultants.com](mailto:pkillian@geiconsultants.com)>

**Subject:** Buth Oil Facility (Former) (BRRTS # 02-05-563707I) SMP & WI/MI Auto Salvage (BRRTS # 02-05-000627) PCM

Andy,

Based on our recent communications, including your email on 11/30/20 (see email chain below), we are providing clarification on the management of soil as part of the reconstruction of Lot 3 for the Georgia-Pacific (GP) Broadway Mill (Mill) that was placed in the berms on the Mill property to supplement information provided in the Site Investigation Report (SIR) dated 3/16/20 and closure request dated 5/15/20 for the Buth Oil Facility (Former) case (BRRTS # 02-05-563707I), which was approved for final closure in a letter from the WDNR dated 8/19/20. We also reaffirm that soil from the Mill's Lot 6 reconstruction associated with the closed Wisconsin/Michigan Auto Salvage case (BRRTS #02-05-000627) was not used to construct the berms.

This email clarification provides sections on background information including a description of Soil Management Areas A and B defined in Lot 3 and responses to the questions from the WDNR's email referenced above. Except where noted, data and figures referenced in the responses below were included in the SIR and/or closure request for the Buth Oil Facility (Former) case and are also attached to this email for easier access.

## Background

As described in Section 1.5 of the SIR and Section 4.A. of the closure request, Soil Management Areas (A and B) were defined to guide soil handling in Lot 3 of the resurfacing project (see Figure B.1.b (iii)) and were also described in the Soil Management Plan (SMP) for Phase 1 of the Broadway Mill Parking Lot Resurfacing Project, dated 3/17/15, and Addendum 1 to the Soil Management Plan (ASMP) dated 5/21/15. Area A occupied approximately 31,000 square feet (sf) and encompassed the portion of Lot 3 having documented petroleum volatile organic compound (VOC) impacts in soil in the areas of the former petroleum fuel aboveground storage tanks (ASTs) for the bulk plant and underground storage tanks (USTs) for a former filling station. Area A also generally coincided with the operational area for the former Buth Oil Facility. Area B occupied approximately 145,000 sf and combined Lot 1-C and the

northern approximately two-thirds of Lot 3. As described in Section 4.A. of the case closure request, field or laboratory evidence of petroleum impact was not observed in Area B.

The WDNR issued an approval letter on 6/1/15 for management of contaminated soil under NR 718, Wisconsin Administrative Code, associated with both the Buth Oil Facility (Former) and the previously closed Wisconsin/Michigan Auto Salvage cases. The letter approved the SMP/ASMP for relocation of up to 2,500 cyd of contaminated soil that may be excavated during the resurfacing activities in Lot 1-C, Lot 3, and the former WI-MI site (Lot 6).

As described in the SIR and closure request, only soil from Areas A and B that did not reveal evidence for petroleum contamination was placed into the berms in the locations shown in Figure B.2.b(ii). Petroleum-contaminated soil from Area A was hauled to the landfill for disposal. The term “low-level petroleum-impacted soils” noted on Figure B.2.b(ii) represents soil from Area A that may contain some low levels of petroleum constituents and was placed into two of the berms, but which did not reveal evidence of petroleum contamination through field screening (see below) during excavation or laboratory testing. Excess soil from Area B (no evidence of contamination) was also used in the berm construction as described below and in Sections 4.A. and 4.C. of the closure request. As described in the Surface Cap Replacement Documentation Report dated 6/9/20 for the Wisconsin/Michigan Auto Salvage case (BRRTS #02-05-000627) and a clarification email on 10/19/20, no soil from Lot 6 was used to construct the berms.

An average 1.5-foot cut was made across Area A in Lot 3 for the new pavement section, and approximately 1,700 cubic yards (cyd) of soil was generated during grading for installation of the new pavement. As described in Section 1.5. of the SIR and Section 4.C. of the closure request, a proportionately small quantity of soil cut for the new pavement section in Area A was determined to be petroleum-contaminated soil and was landfilled (129.37 tons). Accordingly, field and laboratory data confirmed that the substantial proportion of the residual petroleum contamination was present below the cut depth for the pavement section in Lot 3. The estimated extent of residual petroleum soil contamination is illustrated on Figure B.2.b(i) provided in the closure request.

### **Responses to Questions (in bold italics)**

1. Documentation of excavation and soil staging and relocation activities including:
  - i. Sample results - ***Soil analytical results are summarized on Table A.2(i) (preconstruction conditions) and Table A.3 (residual/post-construction conditions). Results for Samples SZ-1 through SZ-13 Table A.2(i) represent preconstruction conditions for the shallow soil zones (SZs) removed from Area A.***
  - ii. Appropriate figures – ***Figure B.1.b(iii) depicts soil management zones and areas in Lot 3. Figure B.2.b(ii) illustrates the locations where soil from Area A (soil not landfilled) and Area B were beneficially reused to construct berms. Figure B.2.b(i) shows the areas of residual soil contamination below the cut depth of 1.5 feet for the new pavement section in Lot 3.***
  - iii. Photo documentation
    1. Mainly of the berms/cap and soil relocation areas – ***Refer to the attached photographic log, abridged from the photographic log included as Attachment D.3 in the case closure request, for images of***

***the berms on the east side of the Mill property and the pavement cap in Lot 3.***

- iv. Description of field activities and observations – As described in the SIR and closure request, an environmental technician screened soil graded from Area A for visual and olfactory observations and using a photoionization detector (PID) with a 10.6 electron volt lamp to qualitatively assess the presence of petroleum VOCs. PID readings above approximately 20 instrument units and/or petroleum odors were detected in soil removed from portions of Soil Zones 1, 4, 7, and 11 corresponding to locations of the southwestern UST excavation and areas at/near the former ASTs (note that the closure request did not list SZ-4). The majority of the residual contamination in Lot 3 was confirmed to be below the grading depth (18 inches). Petroleum-contaminated soil from portions of the soil zones listed above was hauled to Advance Disposal’s Hickory Meadows Landfill in Hilbert, Wisconsin, for treatment/disposal (129.37 tons). To supplement previously provided information, PID readings averaged 108 instrument units for soil that was landfilled and 5 instrument units for other soil removed from Area A and managed on the Mill property in berms. Accordingly, data supports the conclusion that the soil placed in the two “low-level” berms shown on Figure B.2.b(ii) did not exhibit evidence of being contaminated. Rather, “low-level petroleum-impacted soils” noted on Figure B.2.b(ii) represents soil from Area A that may contain some low levels of petroleum constituents based on where it was excavated from, as opposed to exhibiting field or laboratory evidence of petroleum contamination.***
- v. Total volume of material transported (managed) – As presented in the SIR and closure request, volumes of soil managed were: 1) Area A soil to landfill – 129.37 tons of petroleum-contaminated soil. 2) Area A soil to “low level” berms – 1,500 cyd of soil not revealing evidence of contamination. 3) Area B soil – 5,500 cyd of soil not revealing evidence of contamination.***
- vi. Documentation of soil relocation areas – Soil relocation berm locations are illustrated on Figure B.2.b(ii) and photographs of the berms are included in the attached photographic log. Approximately 1,500 cyd of soil not exhibiting evidence of petroleum contamination from Area A was placed into the two berms labelled as “low level” on the Figure B.2.b(ii). Soil from Area A was placed within an envelope of approximately 2 feet of soil from Area B (unimpacted soil). Approximately 6 inches of topsoil was placed over the berms to support a grassy vegetative cover. The other four berms were constructed using soil documented as unimpacted from Area B.***
- vii. A cap maintenance plan – The cap maintenance plan for the residually contaminated areas containing residual petroleum contamination in Lot 3 was provided as Attachment D to the case closure request. Closure request attachments D.1 (Cap Maintenance Plan) and D.2 (Cap Location Map) are provided in the attached PDF.***

We appreciate your review of documentation provided to address questions regarding the management of soil during the Mill parking lot reconstruction associated with two interrelated cases: Buth Oil Facility (Former) Site (BRRTS #02-05-563707) in a portion of Lot 3 and Wisconsin/Michigan Auto Salvage (BRRTS #02-05-000627) in Lot 6.

Please contact us with any questions. We would be pleased to discuss the above responses, as needed.

Thank you,

**GEI** ROGER A. MILLER, P.G., C.P.G.  
Senior Hydrogeologist  
920.455.8657 cell: 920.737.6373  
3159 Voyager Drive, Green Bay, WI 54311



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**From:** James, Andrew G - DNR <[andrew.james@wisconsin.gov](mailto:andrew.james@wisconsin.gov)>

**Sent:** Monday, November 30, 2020 9:39 AM

**To:** Miller, Roger <[rmiller@geiconsultants.com](mailto:rmiller@geiconsultants.com)>

**Subject:** [EXT] WI/Mi Auto Salvage (BRRTS # 02-05-000627) PCM & Buth Oil facility (Former) (BRRTS # 02-05-563707) SMP

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Good Morning Roger,

I hope your holiday was enjoyable. I wanted to touch base with you to outline the remaining items for each of these sites.

Regarding WI\Mi Auto Salvage (BRRTS # 02-05-000627), you had submitted D.1 of the cap maintenance plan which I reviewed and stated you had updated pictures for section D.3 of the cap maintenance plan. You also stated in an email to supplement the June 9, 2020, Surface Cap Replacement Documentation Report, that the soil (81.3 tons) removed from that site was disposed of and not reused.

Once the final cap maintenance plan is submitted and complete, that should be all of the outstanding items for WI/MI auto Salvage.

Regarding the movement of soils on the Buth Oil facility (Former) (BRRTS # 02-05-563707), as outlined in the DNR's June 1, 2015, technical assistance letter approving the management of contaminated soils, we will need the following:

1. Documentation of excavation and soil staging and relocation activities including:
  - i. Sample results
  - ii. Appropriate figures
  - iii. Photo documentation

1. Mainly of the berms/cap and soil relocation areas
  - iv. Description of field activities and observations
  - v. Total volume of material transported
  - vi. Documentation of soil relocation areas
  - vii. A cap maintenance plan

The above listed would seem to wrap up the outstanding items for Georgia Pacific regarding these 2 sites. Thanks Roger,

Andy

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Andy James

Hydrogeologist Remediation & Redevelopment Program

Wisconsin Department of Natural Resources

2984 Shawano Avenue

Green Bay, WI 54313

Cell: 715-527-0114

[Andrew.James@wisconsin.gov](mailto:Andrew.James@wisconsin.gov)



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