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Sent: Friday, September 10, 2021 6:24 AM
To: Ulrich, David; James, Andrew G - DNR; Wood, Tim; Henderson, Dave;
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jacquelyn.beaulieu@gapac.com
Subject: GP Broadway Mill - Buth Oil Site Remediation Discussions
Attachments: 2021.09.09_GP Buth Site DNR Kickoff Minutes.pdf

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All,

Attached are the minutes from yesterday's meeting. Let me know if corrections are needed.

Thanks,

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Proposed Agenda / Talking Points for Georgia-Pacific – Broadway Mill, Buth Oil Remediation Project
9/9/21 Call with GP, AECOM, and Andy James (WDNR).

Minutes written in red

Purpose of call: Review proposed project with DNR and discuss approval process.

Introductions: GP, AECOM, WDNR.

Attendees:

GP: Melissa Mrotek, Michael Moore

AECOM: Shannon Allen, David Ulrich, David Henderson, Tim Wood

WDNR: Andy James

Background:

- The Buth Oil site was formerly a gas station and bulk facility (BRRTS site #02-05-563707).
- Site was remediated and issued case closure with continuing obligations on 8/19/2020.
- Case closure recognized residual groundwater and soil contamination.
- Continuing obligations include cap maintenance and DNR approval of development activities that could impact vapor intrusion risk.

Purpose of project:

- GP would like to conduct additional remediation of the site to remove all continuing obligations and to allow for unrestricted site closure. This will facilitate possible future development on this portion of the property. Proposed remedial activities will include:
 - Excavation and landfill disposal of residual in-situ contaminated soil from two capped areas within the original site footprint. Excavation activities to include confirmation soil sampling for PVOCs.
 - **Would excavate the smear zone.**
 - In-situ treatment (i.e. calcium peroxide) of residual PVOC contamination in groundwater by treating the base of the two excavated areas. Note: no post excavation groundwater monitoring is proposed.
 - **Oxidizing chemistry mixed into soils prior to backfilling.**
 - Removal and landfill disposal of two capped soil berms adjacent to the Fox River, which contain PVOC contaminated soil from the original Buth Oil clean-up. No confirmation sampling proposed.
 - **WDNR would like to look into berms further. Need to review data to understand if residual contamination is present above the standards. Two berms contain the impacted material, the other berms contain non-impacted material from lot 3.**
- **Intent would be to still use property as an industrial facility.**
- **Looking to implement this year.**

Project Tasks:

- Complete necessary DNR submittals prior to excavation.
 - Post-closure modification request with proposed remedial action plan (RAP). Submitted with WDNR review fee.
 - **WDNR has 60 day review, but AECOM would appreciate concurrence so we can keep contractors on parallel path.**

- WPDES General Permit application, *Contaminated Groundwater From Remedial Action Operations*, for infiltration/treatment of groundwater by application of calcium peroxide.
 - Will include spreading/infiltrating calcium peroxide. Request Andy provide input on where this should be routed.
- AECOM to prepare scope and bidding for remedial contractors. GP to contract remedial contractors. AECOM to conduct observation of remedial activities.
- Prepare and submit a NR 724 post-remedial action documentation report for DNR review.
- Prepare a NR 726 case closure request with fees (i.e. closure & GIS removal fees).
 - Clean closure: WDNR would need to review documents and continuing obligations have been satisfied.
- Not proposing installation of groundwater monitoring wells. Due to low level impacts, hoping to dig out, treat, and take confirmation samples in order to consider clean.
 - Need to build a strong case and show site has been remediated. If there's a way to grab a sample to show remediation worked, then may be able to get approvals to not have monitoring wells installed. Andy will need to look into this further.
 - Depending on timing, we may be able to take one groundwater sample from a Geoprobe, temp well, or other means.

Discussion items:

- Is the proposed remedial scope appropriate for unrestricted closure?
- How clean do we need to be for unrestricted closure?
 - NR720 and NR140 and 141
 - Clean closure, need to be below RCL groundwater pathway and standards.
 - >PAL results in continuing obligations, and would need exemptions. Below PAL would be considered clean.
 - If berms do have low level impacts but below standard, would need exemption (NR 718) to move material. If below RCL, could leave material in place.
- Timing – what is needed by DNR prior to starting work?
- DNR contact for the WPDES permitting?
 - WPDES permit application will be routed automatically in WAMS system. Andy to try and identify who the recipient is/will be so AECOM can provide them notice that the application is coming if there are questions.
- Others?
 - Schedule: Would like to have remediation completed by the end of 2021. Would like approvals from WDNR by end of October, so remediation efforts could occur in November.
 - Fees will help push approval timeframes.
 - AECOM/GP planning on submitting RAP documents to the WDNR by mid-October.
 - Andy will run this project past the peer review committee for general comments based on initial conversation.
 - Check in call: Dave Ulrich will reach out to others on availability the last week in September and will get a call set up.