

**From:** James, Andrew G - DNR  
**Sent:** Friday, October 1, 2021 1:23 PM  
**To:** Allen, Shannon (Oshkosh); melissa.mrotek@gapac.com; michael.moore@gapac.com; jacquelyn.beaulieu@gapac.com  
**Cc:** Ulrich, David; Wood, Tim; Henderson, Dave; Zapinski, Mike  
**Subject:** DNR Memo Response - Buth Oil Facility (Former) - 02-05-563707 - 9/30/21 PCM discussion

All,

The minutes look good. Thank you for taking them Shannon. I would like to clarify a few points (clarification in red):

- WDNR reviewed. GEI's soil management plan that was developed prior to closure of the Buth site field screened material suitable for reuse in berms. Material with elevated PID readings or odors was landfilled and not placed in the berms. There was no analytical data collected for the berm material. However, contamination above RCL would not have been allowed by the WDNR to be placed in the berm that close to the water **despite this being and not already within an existing R&R site (DNR will only allow low level (below RCLs) contaminated material (in accordance with NR 718) to be reused at a designated Remediation and Redevelopment Site or Facility)**. The WDNR anticipates the material has low level contaminants since the material was known to be in a location where contamination existed but didn't have indications of RCL exceedances. Low levels are also anticipated since the material was mixed with clean soils.
  - **GEI's Soil management documentation details how the soils were segregated for disposal or reuse ([link to document](#)). There were 2 zones defined based on analytical data. These zones were designated by analytical data as clean (Area B) or areas of known contamination (Area A). A PID and field observations were used to screen all material. The samples with analytical data that did not show evidence of contamination had low PID readings (generally around 5 iu (instrument units)). The samples with analytical data above NR 720 RCLs show PID readings on average of 108 iu, had olfactory and/or visual evidence of contamination. From this information GEI was able to screen the soil at the site to determine if the soil was suitable for reuse (ie below RCLs). DNR does not have analytical data from the bermed areas but the criteria used to segregate this material is in conformance with generally accepted practices for soil management and from this information it is reasonable to believe that the soils that were placed in the berms did not exceed NR 720 RCLs.**
- To summarize, AECOM recalls that the small excavation area did not have groundwater impact, but the large excavation did. A pre-excavation groundwater sample may help department determine if post-sampling is required. If water is present in the excavation following excavation, taking a sample from that groundwater may help support the case for not needing post-sampling data from monitoring wells.
  - **An NR 141 compliant monitoring well is recommended for groundwater sampling.**
- Committee members did mention there is an adjacent Wisconsin-Michigan Auto Sales BRRTS site which is closed with chlorinated compounds in soil. If there is redevelopment in this area, GP will need to consider this BRRTS site for future building developments as well. In 2009 when that site was closed, the WDNR did not have regulations they have today such as the 7E. A 7E would close the case with continuing obligation for future vapor concerns. Although the BRRTS site wasn't closed with these continuing obligations, in reality, the site may have vapor concerns that fall within the criteria of RR800.

- If for example, proposed buildings were proposed adjacent to this area, the WDNR would suggest (not require) vapor barriers since there would be the potential for vapor intrusion. Passive systems would be recommended with a vapor barrier. Not required, but highly recommended.
  - In addition to vapor barriers a Vapor Mitigation System would also be recommended (likely a passive system).

Thank you all for the opportunity to discuss these matters. If there are any follow up questions or comments please let me know.

Sincerely,  
Andy James

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**Andy James**

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Remediation & Redevelopment Program  
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**From:** Allen, Shannon (Oshkosh) <Shannon.Allen2@aecom.com>  
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**Cc:** Ulrich, David <david.ulrich@aecom.com>; Wood, Tim <Tim.Wood@aecom.com>; Henderson, Dave <Dave.Henderson@aecom.com>; Zapinski, Mike <Mike.Zapinski@aecom.com>  
**Subject:** GP Buth Remediation Project Update Call

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Good morning,

Attached are the minutes from yesterday's call. Please let me know if I missed anything or stated something incorrectly.

Thank you,

**Shannon Allen** P.E. (WI, FL)

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## Agenda for Georgia-Pacific – Broadway Mill, Buth Oil Remediation Project

### Minutes written in red

9/30/21 Call with GP, AECOM, and Andy James (WDNR).

Purpose of call: Review status of Buth Oil site post-closure modification project

Participants: GP, AECOM, WDNR.

**AECOM:** Shannon Allen, Dave Henderson, Dave Ulrich, Mike Zapinski, Tim Wood

**GP:** Michael Moore, Melissa Mrotek

**WDNR:** Andy James

### Project Review:

- Plan is to conduct additional remediation of the site to remove all continuing obligations for the Buth site. This will facilitate possible future development on this portion of the property. Remedial activities will include:
  - Excavation and landfill disposal of residual in-situ contaminated soil from two capped areas within the original site footprint.
  - In-situ treatment (i.e. calcium peroxide) of residual PVOC contamination in groundwater by treating the base of the two excavated areas.
  - 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.

### Project Schedule:

- AECOM / GP submit RAP documents to WDNR for review by mid-October. Fee will be paid to help push approval timeframes.
- Obtain WDNR approval by end of October 2021
- Start remedial excavation in early November 2021
- Complete remedial activities in CY 2021

### Project Tasks:

- Complete necessary DNR submittals prior to excavation.
  - Post-closure modification request with proposed remedial action plan (RAP). Submitted with WDNR review fee.
    - Status: Draft completed. Internal AECOM review in progress. **AECOM will be forwarding to GP for review/comment prior to WDNR submittal.**
    - **Will be excavating two areas within former Buth Site and using chemical additive to remediate the site.**
  - WPDES General Permit application, *Contaminated Groundwater From Remedial Action Operations*, for infiltration/**injection**/treatment of groundwater by application of calcium peroxide.
    - Status : Draft completed. Internal AECOM review in progress. **Will be forwarding to GP for review/comment prior to WDNR submittal.**
- AECOM to prepare scope and bidding for remedial contractors. GP to contract remedial contractors.
  - Status: no updates. To be based on RAP

- AECOM to conduct observation of remedial activities.
  - Status: no updates
- Prepare and submit a NR 724 post-remedial action documentation report for DNR review.
  - Status: no updates
- Prepare a NR 726 case closure request with fees (i.e. closure & GIS removal fees).
  - Status: no updates

Follow-ups from previous meeting held on 9/9/21:

- WDNR/AECOM to review contamination levels in the two berms – are levels below RCLs?
  - WDNR reviewed. GEI's soil management plan that was developed prior to closure of the Buth site field screened material suitable for reuse in berms. Material with elevated PID readings or odors was landfilled and not placed in the berms. There was no analytical data collected for the berm material. However, contamination above RCL would not have been allowed by the WDNR to be placed in the berm that close to the water and not already within an existing R&R site. The WDNR anticipates the material has low level contaminants since the material was known to be in a location where contamination existed but didn't have indications of RCL exceedances. Low levels are also anticipated since the material was mixed with clean soils.
  - In short, the material can be left in place, if the berms are disturbed though, the material would need to be characterized to confirm it's not contaminated.
  - The WDNR not aware of continuing obligations associated with the berms.
- WDNR to provide feedback on AECOM proposal for minimal confirmatory groundwater monitoring.
  - The last groundwater sample was taken in 2015. There is a likelihood that concentrations have decreased, which would be considered favorable.
  - Data will need to dictate the need for confirmatory groundwater monitoring. Providing as much data as possible will help support the case for minimal monitoring. Suggestions include:
    - Sample groundwater prior to work to show how conditions have changed since 2015. If results are favorable, this could help support the case for minimal monitoring.
    - Pump groundwater to remove contaminated ground water. However, given the clay environment of this site, this course of action likely may not reduce levels much.
  - To summarize, AECOM recalls that the small excavation area did not have groundwater impact, but the large excavation did. A pre-excavation groundwater sample may help department determine if post-sampling is required. If water is present in the excavation following excavation, taking a sample from that groundwater may help support the case for not needing post-sampling data from monitoring wells.
  - AECOM should draft up the Remedial Action Plan with as much detail as possible in the initial submittal. The WDNR would approve the work plan as its submitted, but AECOM can email changes/addendums to the plan as adjustments are needed.
- WDNR to provide feedback/general comments from the peer review committee based on initial conversation.
  - Andy did not bring to peer group since this would be a bit premature in the process, but Andy did discuss the project in general with members of the committee individually. In discussion with the committee members, the approach seems reasonable, but data will need to support what's being proposed.

- Committee members did mention there is an adjacent Wisconsin-Michigan Auto Sales BRRTS site which is closed with chlorinated compounds in soil. If there is redevelopment in this area, GP will need to consider this BRRTS site for future building developments as well. In 2009 when that site was closed, the WDNR did not have regulations they have today such as the 7E. A 7E would close the case with continuing obligation for future vapor concerns. Although the BRRTS site wasn't closed with these continuing obligations, in reality, the site may have vapor concerns that fall within the criteria of RR800.
  - If for example, proposed buildings were proposed adjacent to this area, the WDNR would suggest (not require) vapor barriers since there would be the potential for vapor intrusion. Passive systems would be recommended with a vapor barrier. Not required, but highly recommended.
  - If for example the site was disturbed such as to do utility work, GP would need to do post-closure modification, but would not need to reopen the BRRTS case. GP would not need to reassess items not originally assessed during closure. With a post closure modification request, the WDNR would not impose new 'continuing obligations' i.e. vapor intrusion requirements, to the site. If GP requests the site be reopened, then the WDNR could impose new continuing obligations, including vapor intrusion requirements.
  - The WDNR would provide recommendations based on RR800. The WDNR technically would not have authority to require items because there is not a 7E associated with the case (continuing obligation for future vapor concern) and RR800 is a 'guidance' document.
- WDNR to confirm who is the WPDES permit submittal DNR contact?
  - WDNR PM would be Dave Haas.
    - Dave Haas is on vacation until Oct. 9.
    - Typically, approvals are given within a week. Department is allowed 60 days.
    - Dave Haas has been aware of the tight schedule. Once RR reviews, then it's just a matter of issuing the permit.
    - To minimize delays, confirm request/application is complete.
  - GP Applicant name in the past was Michael Moore and he can be listed again on the permits.

#### Any other discussion?

- Post-closure modification is not specifically called out in WDNR RR fee schedule.
  - Fee would be \$1,700 total, broken up as: \$1,050 for review, \$350 for groundwater GIS database fee, and \$300 for soil GIS database fee.
  - RAP can be part of post-closure modification request.

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