

From: James, Andrew G - DNR
Sent: Friday, November 12, 2021 1:01 PM
To: Ulrich, David; Allen, Shannon (Oshkosh); Wood, Timothy; Henderson, David; Mrotek, Melissa A; Moore, Michael T; Beaulieu, Jacquelyn Marie
Subject: Post-Closure Modification Notice to Proceed for Buth Oil Facility (Former), BRRTS # 02-05-563707

Good Afternoon All,

On November 11, 2021, the Department of Natural Resources (DNR) received a complete Post Closure Modification (PCM) request which included the DNR review fee (\$1050), soil database fee (\$300) and Groundwater (GW) database fee (\$350). The PCM request was submitted to the DNR on behalf of Georgia-Pacific Consumer Operations LLC (GP) by AECOM Engineering Company. GP is requesting to remove all of the Continuing Obligations (COs) for one of the closed contamination cases on their property located at 1919 S. Broadway in Green Bay, Wisconsin (Property), the Buth Oil Facility (Former) - BRRTS # 02-05-563707 (Buth). The Buth case is contained entirely within GP's Lot 3 which is an employee parking lot in the northwest portion of the Property. On August 19, 2020, the Buth case was closed with COs for residual soil and groundwater contamination, cap maintenance for GW protection, an industrial zoning and land use restriction, and future vapor intrusion concerns. In order to begin construction and environmental work at the Property for the Buth case, GP must disturb the cap that is currently in place.

This email serves as your notice to proceed with the work as outlined in the November 11, 2021, PCM document with the following comments:

- This approval is only applicable to the excavation of contaminated soil, cap disturbance and GW monitoring activities proposed. Any proposed injection requires a separate approval under an injection request submitted to DNR with the applicable fee.
- The Wis. Admin. Code ch. NR 141 compliant monitoring well to be installed for pre-remedial GW sampling must intersect the surface of the water table. Current data suggests GW to be at 3' below ground surface (bgs). In order for the screen interval to adequately intersect the water table, DNR recommends a screen interval of 3-13'bgs.
- Depending on the results of GW sampling, multiple rounds of post remedial GW sampling from a Wis. Admin. Code ch. NR 141 compliant monitoring well, will likely be necessary to demonstrate that the contaminants in GW are no longer exceeding established Wis. Admin. Code § NR 140.10 public health related GW standards.

After the environmental work is complete, a report documenting the actions taken at the site and modifications to the cap, including a revised cap maintenance plan with photo documentation, is required to be submitted to document the changes that will occur at the Property. After this documentation is submitted to the DNR, a review will be conducted and the DNR will request any revisions needed (if necessary). The DNR will then provide a closure addendum letter which will outline the modifications to the Property and any changes to the continuing obligations that can be made based on the data provided from the post closure modification activities.

At this time DNR would like to advise that residual Chlorinated Volatile Organic Compounds (CVOCs) remain in soil and GW on GP property from a closed BRRTS case, Wisconsin/Michigan Auto Salvage – BRRTS # 02-05-000627 (WI/MI). The majority of the WI/MI case is located immediately adjacent to Lot 3 in what is now known as Lot 6; however, GW contamination from this closed case does extend partially

into Lot 1-c and Lot 3. The type and concentration of CVOCs in soil and GW have the potential to volatilize, which could result in a vapor intrusion risk through preferential pathways. This is of specific concern for enclosed structures. DNR highly recommends considering the risk of vapor intrusion via vapor migration and evaluating this pathway for any new construction, with the established CVOC screening guidelines in DNR's Vapor Intrusion guidance document, RR-800.

Should you have any questions or concerns regarding the NTP, please let DNR know. Thank you and have a nice day.

Sincerely,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Andy James

Hydrogeologist

Remediation & Redevelopment Program

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From: Ulrich, David <david.ulrich@aecom.com>

Sent: Monday, October 25, 2021 12:44 PM

To: James, Andrew G - DNR <andrew.james@wisconsin.gov>

Cc: Allen, Shannon (Oshkosh) <Shannon.Allen2@aecom.com>; Wood, Timothy <Tim.Wood@aecom.com>; Henderson, David <Dave.Henderson@aecom.com>; Mrotek, Melissa A <MELISSA.MROTEK@GAPAC.com>; Moore, Michael T <MICHAEL.MOORE@GAPAC.com>; Beaulieu, Jacquelyn Marie <jacquelyn.beaulieu@gapac.com>

Subject: GP Buth Remedial Action Request

CAUTION: This email originated from outside the organization.

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Hi Andy, on behalf of Georgia-Pacific, AECOM has prepared a Post Closure Modification Request and Remedial Action Plan for the former Buth Oil facility, BRRTS site #02-05-563707. Please click the link below to access the document. Note that this link will expire in 14 days.

<https://we.tl/t-6S19CXrnao>

The required fees for this review will be submitted to Denise Denalski as requested. Please advise if there is an electronic payment option.

Please let me know if you are able to review this submittal, and if you desire it to be broken into smaller files.

We will be pursuing a path for preremedial groundwater monitoring. In order to keep this project moving, we are requesting your review and approval of this planned work at your earliest opportunity.

Thanks much.

David S. Ulrich
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