



September 14, 2020

GEORGIA PACIFIC  
ATTN MIKE HASSETT  
133 PEACHTREE ST NE  
ATLANTA GA 30303

Subject: Review of Site Investigation Work Plan  
Ashview Terrace Apartments  
988-1020 Willard Drive, Ashwaubenon, Wisconsin  
BRRTS #: 02-05-564043

Dear Mr. Hassett:

On June 8, 2020, the Wisconsin Department of Natural Resources (DNR) received the "Site Investigation and Remediation Work Plan" (Work Plan) for the Ashview Terrace Apartments contamination case as prepared by Wood Group PLC (Wood). The Work Plan was submitted with a fee for DNR review and response. The submittal of a Site Investigation Work Plan (SIWP) is required per Wis. Admin. Code § NR 716.09, as this site is subject to regulation under Wis. Stat. § 292. The DNR reviewed the Work Plan for consistency with Wis. Admin. Code §§ NR 716.07 and 716.09 and has determined that the general code requirements have been met with additional comments as provided in this response letter.

### Background

The Ashview Terrace apartment complex includes approximately 50 units on 3.4 acres directly across from Ashwaubenon High School. Ashview Terrace lies atop a former fill area that accepted paper sludge through the 1950's. PCB, mercury and lead-contaminated sludge exists in abundance at depths between 4 and 20 feet below ground surface. At the surface, sludge may exist in smaller amounts, mixed with soil brought in for construction and cover purposes. The soil is not an engineered cover. Some soil samples exceed Direct Contact Residual Contaminant Levels (RCLs) from the ground surface to 18 inches, which is the required minimum separation depth for PCB and metals contamination.

Site investigation occurred between 2009 and 2017. Three work phases between 2015 and 2017 led to informal SI approval (no fee) in 2017. In December 2017, Wood and GP met with the DNR (no fee) to propose a draft remediation plan. The plan was revised in 2019 and presented again in a meeting (no fee) with the DNR.

The plan called for 12 landscaping features throughout the property, meant to be a barrier to the highest known concentrations of PCBs found at the property. The 12 structures included geotextile fabric, landscaping stone and plantings that cover approximately 2% of the property, and 10% of the area inside the former pit extent that is currently covered with green space.

After internal peer review, the DNR informed Wood that the remediation plan was not approved, because it left a large amount of un-investigated grass area exposed. Further administrative evaluation showed that additional

investigation was necessary to determine where PCB contamination may be present, in order to provide a suitable cover for those areas. Wood prepared the June 8, 2020 work plan to investigate areas where the level of PCB contamination in the top 18 inches of material is not known.

### SIWP Summary

To delineate PCB, mercury and lead contamination in soil, the Work Plan proposes the following:

- 57 additional soil borings in the top 18 inches of site soil to determine the presence (or absence) of sludge surrounding areas with known sludge. The presence sludge in the top 18” of soil is considered to be an indicator that a direct contact risk exists.
- Approximately 10% of the 57 samples would be analyzed for PCB, lead and mercury, including speciation of mercury to determine if elemental mercury is present.
- If sludge is found, complete additional step-out borings to find the limits of sludge in each cap area.

### DNR Review of the SIWP

Following the DNR’s review of the Report, the DNR requests that you revise this submittal to address the following items to meet regulatory requirements:

#### 1. Soil Sampling Strategy

The samples from borings B-1 and SB16-01 show that direct contact RCL exceedances may exist in soil, even when sludge is not present. Therefore, borings that previously were installed only to evaluate the presence of sludge (e.g. SS17-07, SS17-10, SS17-11 and similar) do not demonstrate that the current soil cap is protective. The work plan proposes to sample 10% of the borings for the presence of PCBs, lead and mercury.

- a. The DNR requests that sampling occurs for all borings where no sludge is present, due to the sample results at B-1 and SB6-01.

#### 2. Sample Location

- a. The sample at B-1 shows that direct contact RCL exceedances may exist outside the former excavation area. The DNR requests that the extent of contamination near boring B-1 be further evaluated, including off-site (if warranted).
- b. Evaluate the western property boundary in green space areas that have not been previously sampled.
- c. Evaluate the northeast area where no samples have previously been collected.
- d. When sludge is found, step out to identify the extent of sludge in the top 18” of soil.

#### 3. Remedial Action Design

- a. The DNR requires 18” of clean material between the ground surface and Direct Contact RCL exceedances. In areas where landscaping features are planned, that are less than 18” thick, there must be additional clean soil below the landscaping in order to create the 18” separation.

4. Emerging Contaminants/PFAS

- a. The DNR issued a letter regarding emerging contaminants on August 17, 2020, requesting an evaluation for the presence of emerging contaminants on this property per Wis. Admin. Code Wis. Admin. Code § NR 716.07. Please provide the scoping evaluation of emerging contaminants/PFAS consistent with Wis. Admin. Code § NR 716.07 for this site prior to the submitting the revised site investigation work plan. This will allow the DNR to review the scoping evaluation, advise you or our review and allow you to incorporate potential emerging contaminate/PFAS sampling into your revised site investigation workplan.

5. Other DNR Comments

- a. Sampling results must be sent to the DNR and property owner(s), including owners of off-site properties from which samples have been collected, within 10 days of receipt (Wis. Admin. Code § NR 716.14).

6. Electronic versus Paper Submittals

- a. The DNR waives the NR 700 requirement for paper submittals on all documents, and reserves the right to request a paper copy of any submitted document as necessary.

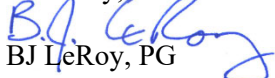
Schedule

The submitted Report includes a schedule for conducting the field investigation and reporting the results, per Wis. Admin. Code § NR 716.09(2)(h). Furthermore, the DNR is requesting implementation of the following schedule:

- The DNR requests the submittal of the emerging contaminant/PFAS scoping by October 17, 2020, so that it may be approved prior to completing the final work plan.
- The DNR requests the submittal of a revised site investigation work plan by November 17, 2020 to address the comments identified above. The work plan must comply with the requirements identified in Wis. Admin. Code § NR 716.09(2).
- Site investigation results must be submitted to the DNR in a comprehensive Site Investigation Report (SIR) that meets the requirements in Wis. Admin. Code § NR 716.15. The SIR must be submitted to the DNR within 60 days after completion of the field investigation and receipt of laboratory data. The DNR suggests that the SIR be submitted with a fee for review and response.
- NR 700 semi-annual progress reports are required until the case is closed.

The DNR appreciates the efforts you are taking to address the contamination at this site. If you have any questions about this letter, please contact me, the DNR Project Manager, at (920) 889-0151 or [BJ.LeRoy@Wisconsin.gov](mailto:BJ.LeRoy@Wisconsin.gov).

Sincerely,



BJ LeRoy, PG  
Hydrogeologist, Northeast Region  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

cc: Joe Renier, Andrew Fiskness, Wood Group PLC