



May 8, 2019

Mr. Tim Ellsworth  
Vice President – Manufacturing  
Georgia-Pacific Green Bay Operations  
Georgia-Pacific Corporation  
1919 South Broadway  
Green Bay, Wisconsin 54304

Subject: Request for additional information  
GP Broadway Mill Expansion, 1919 South Broadway, Green Bay, WI  
BRRTS number is pending

Dear Mr. Ellsworth:

On April 16, 2019, Mr. Jeff Maletzke of AECOM, provided notification on behalf of Georgia Pacific Corporation (GP) to Wisconsin Department of Natural Resources (department) of soil sampling results for Polychlorinated Biphenyls (PCBs) and Toxicity Characteristic Leaching Procedure (TCLP) results for metals and select Volatile Organic Compounds (VOCs). AECOM is in the process of preparing a workplan to further assess the area of the proposed mill expansion.

The purpose of this letter is for the department to officially request additional information regarding per- and polyfluoroalkyl substances (PFAS). The department requests that GP provide information **within 60 days** related to past and present usage, management, or disposal of PFAS compounds at the facility located at 1919 South Broadway, Green Bay, Wisconsin (the Facility). This information is required to evaluate potential releases of PFAS at the Facility. The department requests this information under the authority of Wis. Stats. §§ 292.11(8) and 292.31(1), and requests that you provide the information in Wis. Stats. §§ 292.31(1)d(1) through (3):

*(d) Access to information. Upon the request of any officer, employee or authorized representative of the department, any person who generated, transported, treated, stored or disposed of solid or hazardous waste which may have been disposed of at a site or facility under investigation by the department shall provide the officer, employee or authorized representative access to any records or documents in that person's custody, possession or control which relate to:*

- 1. The type and quantity of waste generated, transported, treated or stored which was disposed of at the site or facility and the dates of these activities.*
- 2. The identity of persons who generated, transported, treated or stored waste which was disposed of at the site or facility.*
- 3. The identity of subsidiary or parent corporations, as defined in sub. (8) (a) 3., of persons who generated, transported, treated or stored waste which was disposed of at the site or facility.*

Specifically, the department requests response to the following items:

1. Describe the use and manufacture of PFAS or PFAS-containing materials at the Facility from the receipt of the material to the final use, sale or disposal of PFAS or PFAS-containing materials. Include in that description the information on all entities responsible for its manufacture and use; the years involved in its manufacture and use; what it was used to manufacture; whether any product containing PFAS was used or tested at the Facility; the areas of the Facility where it was manufactured and used; and whether it was emitted from any air emission sources.
2. Describe, using generic and trade names, the materials containing PFAS that were transported to or from, disposed of, stored, produced, used, handled, managed, or processed at or related to the Facility. The description should include the physical form (solid, liquid, gas) of any materials and the type of container used to transport, store, produce, use, handle, manage, or process the PFAS.
3. Describe the transportation to or from, production, disposal off, storage, use, handling, management, and processing of PFAS-containing material related to the Facility. Include in each description where and in what process at the Facility, the transportation to or from, disposal storage, use, handling, management. and processing of PFAS-containing material occurred at the Facility. *E.g.*, the material was disposed of in landfill, drained to soil sewer drain, etc. If the point of transportation to or from, production of, disposal of, storage, use, handling, management, or processing of PFAS-containing material changed over time, please provide dates of such changes and what changes were made.
4. Estimate the amounts of PFAS-containing materials that were transported to or from, disposed of, stored, produced, handled, managed, or processed at or related to the Facility.
5. Identify which part of GP's operations, including storage, involving PFAS or PFAS-containing materials, generated waste, including but not limited to wastes resulting from spills of liquid materials and wastes generated by cleaning and maintenance of equipment, inventory cleanout, off-specification determined wastes and machinery. Include locations where the waste was generated and stored, and an estimation of the volume or mass of the waste generated and stored.
6. Identify releases of PFAS or PFAS-containing materials and describe the methods used to clean up the releases including but not limited to:
  - a. The types of materials spilled,
  - b. The media onto or into which the spill occurred,
  - c. The materials used to clean up those spills,
  - d. The methods used to clean up those spills, and
  - e. Where the materials used to clean up those spills were disposed of.
7. Describe the cleaning and maintenance of equipment and machinery involved in PFAS operations, including but not limited to:
  - a. The types of materials used to clean and maintain this equipment/machinery,
  - b. The monthly or annual quantity of each such material used,
  - c. The disposition of those materials used in cleaning equipment, and
  - d. Where the materials are/were disposed of.

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8. Was there ever a spill, leak, release, or discharge of PFAS into any subsurface disposal system or floor drain inside or under the buildings within the Facility, or that may have migrated from the Facility? If so, identify:
  - a. Where the disposal system or floor drains were located,
  - b. Whether the disposal system or floor drains were connected to pipes,
  - c. Where such pipes were located and emptied,
  - d. Whether such pipes ever leaked or in any way released the substances into the environment.

This information request applies to data and information that you or others may have collected prior to, or during, ownership of the property. Please provide any additional information that may aid in determining the source(s) of PFAS discharge(s). Please send the information to Keld Lauridsen at 2984 Shawano Avenue, Green Bay, WI.

The "confidentiality of information" provisions are found in s. NR 700.05, Wis. Admin. Code. In order to maintain any of the information that GP has or will submit to the Department as confidential, GP would need to request that the specific information be kept confidential and provide sufficient information to the department to make such a determination, in accordance with that provision.

Sincerely,

  
Keld Lauridsen  
Hydrogeologist  
Remediation and Redevelopment Program

ec: Albert Cole, AECOM (Albert.Cole@aecom.com)