Lauridsen, Keld B - DNR

From: Lauridsen, Keld B - DNR
Sent: Friday, May 10, 2019 3:21 PM
To: 'Kraeutler, Thomas M.'
Cc: Cole, Albert; Peterson, Terry A.; Maletzke, Jeff; Mrotek, Melissa (GBY); Romback-Bartels, Jean - DNR; Chronert, Roxanne N - DNR
Subject: RE: Release Notification and Release Confirmation Sampling Plan - Georgia-Pacific Broadway Mill

Thanks for the additional documentation and the brief workplan.

I have reviewed the information provided and I'm in general agreement with the initial proposed scope of work outlined in the brief workplan. However, I do recommend that soil collected at the B-105 location be analyzed for cadmium in addition to benzene in order to rule out cadmium as a contaminant of concern in soil. Also, keep in mind that if soil contamination is confirmed in the additional soils borings above the groundwater pathway, the non-industrial direct contact and/or the industrial direct contact Residual Contaminant Levels (RCLs), degree and extent of contamination needs to be defined and further site investigation for soil and/or groundwater will have to be completed.

Let me know if there is anything you would like to discuss further.

Have a nice weekend.

-Keld

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Keld B. Lauridsen
Phone: (920) 662-5420
Keld.Lauridsen@wisconsin.gov

From: Kraeutler, Thomas M. <Thomas.Kraeutler@GAPAC.com>
Sent: Thursday, May 9, 2019 7:49 AM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>; DNR RR NER <DNRRRNER@wisconsin.gov>
Cc: Cole, Albert <Albert.Cole@aecom.com>; Peterson, Terry A. <terry.peterson@aecom.com>; Maletzke, Jeff <Jeff.Maletzke@aecom.com>; Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>; Romback-Bartels, Jean - DNR <Jean.RombackBartels@wisconsin.gov>
Subject: Release Notification and Release Confirmation Sampling Plan - Georgia-Pacific Broadway Mill

Dear Mr. Lauridsen,

Per your request in our conference call on April 17, 2019, please see the attached release notification and release confirmation sampling plan for Georgia-Pacific Consumer Operations LLC's Green Bay Broadway Mill. We kindly request you identify this release as "pending" until the results of our confirmatory sampling plan are obtained.

Please contact myself or Mr. Bert Cole of AECOM (920-236-6721; albert.cole@aecom.com) if you have any questions.

Thank you,

Tom Kraeutler
Environmental Engineer
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: (920) 438-4969
Cell: (920) 639-6026

Georgia-Pacific
Consumer Operations LLC

1919 S. Broadway
P.O. Box 19130
Green Bay, WI 54307-9130
(920) 435-8821
www.gp.com

May 9, 2019

SUBMITTED VIA EMAIL

Mr. Keld Lauridsen
Hydrogeologist
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727

Subject: **Release Notification and Release Confirmation Sampling Plan for Georgia-Pacific Consumer Operations LLC – Green Bay Broadway Mill**

Dear Mr. Lauridsen:

Georgia-Pacific Consumer Operations LLC (GP) is providing the Wisconsin Department of Natural Resources (WDNR) with this Work Plan for Subsurface Environmental Investigation Services at the GP Broadway Mill, located at 1919 South Broadway Street, in the City of Green Bay, Wisconsin. This letter includes a formal notification of release as well as a brief work plan for a site investigation to confirm the release.

Background

GP is currently considering an expansion to include a new Paper Machine and Building, Broke Processing Pulper, a Parent Roll Storage Warehouse, and a Converting Building. These buildings have a total footprint of approximately 320,000 sq. ft. in area. These new buildings, their associated roadways, and support features will be sited on the northeast portion of the existing GP mill site, generally within the existing coal pile area adjacent to the Fox River. Existing buildings that are within the expansion footprint will be demolished. A geotechnical investigation was recently conducted as part of the expansion planning, which included collection of sub-surface soils samples to characterize and profile on-site soils that may be displaced to accommodate future building foundations.

Description of Initial Sampling and Results

Five geotechnical borings (B-101, B-102, B-103, B-104A, and B-105) were completed to obtain preliminary geotechnical information regarding the nature of the soils on site and the quality of the fill material at the locations shown on Figure 1. As it was anticipated that some of the buried coal and fill material might need to be removed from the site, a composite sample of the fill material beneath the coal was collected for TCLP and PCB sampling required for disposal of the soils at a landfill. Samples were analyzed for TCLP metals, TCLP VOCs, and TCLP SVOCs. Each sample was also analyzed for PCBs and PCB isomers. The results of this sampling indicated the presence of benzene, MEK, Cadmium, and Barium in the TCLP samples and PCBs in one soil sample. MEK was determined to be a laboratory contaminant and Cadmium and Barium are likely present in the background soils. Total PCBs were detected in soil boring B-103 at a concentration less than 1 ppm, which is less than the criterion established by TSCA for unrestricted use, however, above DNR reporting standards. Benzene was also present in TCLP samples collected in B-103, B-104A, and B-105. Samples collected in B-104A and B-105 were collected in saturated fill material immediately beneath the coal. Coal fill on the site ranges from

1 foot to up to 10 feet deep across the site. Urban fill in these locations ranges from a depth of 7 feet to 18 feet deep with 3 to 5 feet of soil at the surface of each of the borings with the exception of boring B-101 which had 5.5 feet of surface fill on top of 2 feet of coal. Table 1 provides a summary of the analytical data and the regulatory standards. Boring logs and the analytical reports are also enclosed as Attachment A and Attachment B, respectively.

Contaminant Source Identification

Historical documents, state and federal regulatory documents, and interviews with Site personnel were conducted to evaluate potential on and off-site sources of contaminants that may be contributing to the observed benzene, PCB and metals, on-site impacts, and/or other impacts to the Site. On-site sources identified that may be contributing to the known benzene impacts at the Site included the coal handling operations and miscellaneous urban fill. There have also been a few historically identified potential on-site releases which have been remediated. There is no known source for the low-level PCB detection, and this is expected due to an anomaly contained in the urban fill.

Confirmatory Sampling Plan

As was discussed in our conference call on April 17, 2019, GP is providing a notification of release for the PCBs detected on site (WDNR Form 4400-225 is enclosed as Attachment C). GP is also providing a simple work plan to better define the nature and extent of PCBs and benzene in the subject area. GP believes that Cadmium and Barium are present in the naturally occurring site soils and their detected presence via TCLP analyses is likely attributable to this fact. Therefore, GP does not propose further sampling for Barium and Cadmium. The MEK was confirmed to be a laboratory contaminant by the lab (see Attachment B). Our sampling plan for each point is outlined below. Our intent is to utilize a Direct Push Technology (DPT) rig to collect two soil samples at each location using a double-cased boring to prevent cross-contamination by the surface coal. GP will also collect six additional samples at three different points around each boring to be held for future analysis.

- **B-101**: Collect unsaturated soil samples directly adjacent to the original geotechnical boring location at 3 feet below ground surface (ft. bgs), and then in native clay at a depth of 8.5 to 9.0 ft. bgs and submit for laboratory analysis of PCBs. Collect two additional samples at the same depths from each of three locations 10 feet from boring 101 and hold for later analysis of PCBs. If no PCBs are detected above the corresponding Industrial Direct Contact Residual Soil Contaminant Levels (RCLs) for the respective Aroclor or Total PCBs directly adjacent to the original geotechnical boring, GP will not analyze the other six held samples. If the previous PCB result is confirmed, a groundwater sample will be collected from a temporary well installed north of B-101. Groundwater occurs at approximately 9 ft. bgs.

- **B-102**: No sample to be collected since Cadmium is within background levels in soils.

- **B-103**: Collect unsaturated soil (non-coal) samples directly adjacent to the original geotechnical boring at 5.5 ft. bgs and 7.0 to 8.0 ft. bgs within fill and submit for laboratory analysis of Benzene (purge and trap/gas chromatography mass spectrometry). Collect two additional samples at the same depths from each of three locations 10 feet from boring 103 and hold for later analysis of Benzene. If benzene is not detected above the Industrial Direct Contact RCL, GP will not analyze the other six held samples. If the previous result is confirmed, the six additional held samples will be released for analysis for benzene.

- **B-104A**: The boring log for the original geotechnical boring indicates coal nearly to the water table at a depth of approximately 5 ft. bgs. Therefore, it may not be possible to obtain an unsaturated soil sample that is not coal. A saturated or unsaturated soil (non-coal) sample will be collected directly

adjacent to the original geotechnical boring at approximately 4.8 ft. bgs within fill and submitted for laboratory analysis of Benzene. Additional samples will be collected from each of three locations as described above for B-103.

- **B-105**: The boring log for the original geotechnical boring indicates coal to the water table at a depth of approximately 5 ft. bgs. Therefore, it may not be possible to obtain an unsaturated soil sample that is not coal. A saturated or unsaturated soil (non-coal) sample will be collected directly adjacent to the original geotechnical boring at approximately 5 ft. bgs within fill and submitted for laboratory analysis of Benzene. Additional samples will be collected from each of three locations as described above for B-103.

No groundwater samples are expected to be collected during this sampling event.

Please contact me at (920) 428-4969 or thomas.kraeutler@gapac.com if you have any questions.

Sincerely,

Thomas Kraeutler
Environmental Engineer
Georgia-Pacific Consumer Operations LLC
Broadway Mill

Enclosures: Figure 1 – Confirmation Sampling Locations
Table 1 - Summary of Parameters Detected
Attachment A - Boring Logs B-101, B-102, B-103, B-104A, B-105
Attachment B - Analytical Report from Northern Lake Service, Inc.
Attachment C - Form 4400-225 Notification for Hazardous Substance Discharge

Figure 1

Confirmation Sampling Locations

B-101

B-102

B-103

B-104A

B-105

Legend

- Geotechnical Boring Completed January 2019/Proposed Confirmation Sample Location
- Confirmation Sample Location (~10' from initial Geotechnical Boring)

0 40 80 160 240 320

Feet

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

AECOM

Figure 1

Confirmation Sample Locations
Proposed Project PACE
Georgia-Pacific Broadway Mill

Georgia-Pacific
Green Bay, Wisconsin
Project# 60594990
May 1, 2019

Filename: \\172.25.156.10\12Projects\Projects\60594990 P-2 GP Broadway Mill\900-CAD, GIS\920-929 GIS-Graphics\Boring Map\Confirmation Sample Location.mxd

Table 1

Summary of Parameters Detected

Table 1
Summary of Parameters Detected January/February 2019
Project PACE Mill Expansion
Georgia Pacific Broadway Mill - Green Bay, Wisconsin
Project No. 60594990

							Residual Soil Contaminant Levels (ch NR 720 Wis. Adm Code) (ug/kg)		
Parameter	**Unit**	**B-101**	**B-102**	**B-103**	**B-104A**	**B-105**	**Industrial Direct Contact**	**Background Threshold**	**Protective of Groundwater Quality (DF=2)**
Barium	ug/L	710	210	450	330	370	100,000,000	364,000	164,800
Cadmium	ug/L		[2.8]			[2.1]	985,000	1,000	752
PCB-1242	ug/Kg	490					972	--	--
PCB-1260	ug/Kg	500					1,000	--	--
Total PCBs	ug/Kg	990					967	--	9.4
Benzene	ug/L			4.4	[0.55]	[0.50]	7,070	--	5.1
Methy ethyl ketone	ug/L	[1.8]	2.5	[1.5]	[0.67]	[0.59]	28,400,000	--	1,666.1

Notes:

1. With the exception of PCBs, samples were analyzed by the Toxicity Characteristic Leaching Procedure (TCLP).
2. Values in brackets represent results greater than or equal to the Limit of Detection (LOD), but less than the Limit of Quantitation (LOQ), and are within a region of "less certain quantitation."
3. Only parameters with detections are shown.
4. DF = Dilution Factor
5. Background threshold values are non-outlier trace element maximum levels in Wisconsin surface soils from USGS report at http://pubs.usgs.gov/sir/2011/5202.

Attachment A

Boring Logs B-101, B-102, B-103, B-104A, B-105

AECOM

OWNER: **Georgia-Pacific**

LOG OF BORING NUMBER: **B-101**

PROJECT NAME: **P-2 GP Broadway Mill**

ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

SURFACE ELEVATION +592.14 NAVD88

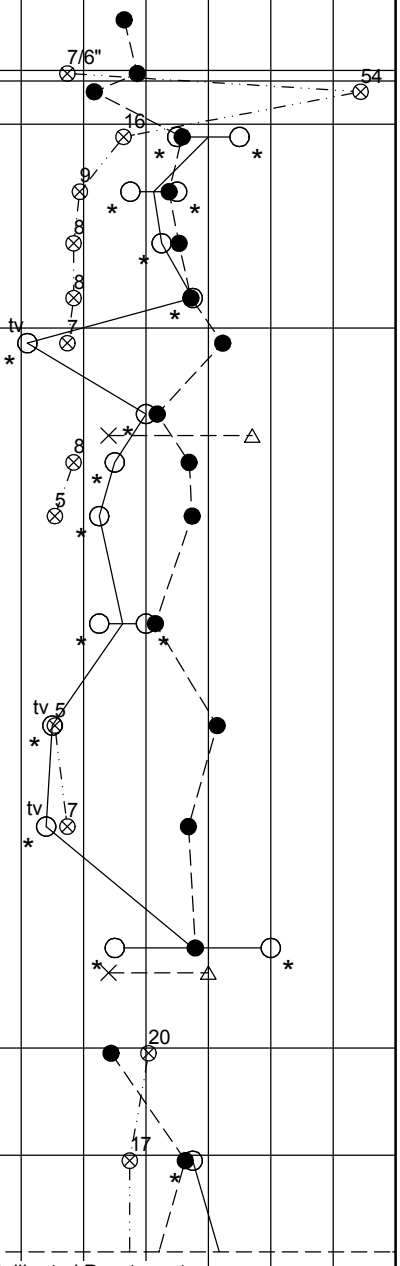
DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE RECOVERY	DESCRIPTION OF MATERIAL
		HA		Fill: Clay with gravel, sand, and coal cinders - reddish brown (CL)
	1	HA		
5.0		HA		
	2	SS		5.0
	2A	SS		Fill: Sand - trace gravel - brown - medium dense -moist (SP) 5.5
		PA		7.5
	3	SS		Fill: Coal
10.0		PA		Clay - trace sand and gravel - light reddish brown to brown - medium to very stiff (CL)
	4	SS		
		RB		
	5	SS		
15.0		RB		
	6	SS		
		RB		17.0
	7	SS		Clay - trace silt - brown - soft to very stiff (CL)
20.0		RB		Sample 7 - low recovery
	8	ST		
		RB		
	9	SS		
25.0		RB		
	10	SS		
		RB		
30.0				
	11	ST		
		RB		
35.0				
	12	SS		
		RB		
40.0				
	13	SS		Sample 13 - low recovery
		RB		
45.0				
	14	ST		
		RB		
50.0				
	15	SS		50.5
	15	SS		Sandy silt - little to trace gravel - brown - medium dense - wet (ML)
		RB		
55.0				55.5
	16	SS		Clay - intermittent silt seams - brown - very stiff (CL)
		RB		
60.0				

UNIT DRY WT. LBS./FT.^{3}

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)



. . . continued

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

AECOM JOB NO. **60594990**

SHEET NO. **1** OF **2**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM	OWNER: **Georgia-Pacific**	LOG OF BORING NUMBER: **B-101**
	PROJECT NAME: **P-2 GP Broadway Mill**	ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)

DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
					SURFACE ELEVATION +592.14 NAVD88 (Continued)	
	17	SS			Clay - intermittent silt seams - brown - very stiff (CL)	
		RB			63.5	
65.0	18	SS			Silty sandy clay - trace gravel - brown - very stiff (CL-ML)	
		RB			68.5	
70.0	19	SS			Clay - brown - very stiff to hard (CL)	
		RB				
75.0	20	SS				
		RB			78.5	
80.0	21	SS			Clay - trace gravel - reddish brown - stiff (CL-CH)	
		RB				
85.0	22	SS				
		RB				
90.0	23	SS				
		RB			92.4	
95.0	24	SS			Silty sand and gravel - gray - very dense - wet (SM-GM)	
		RB			97.6	
100.0	25	SS			Clay - trace silt - light gray - stiff (CL-ML)	
		RB			103.4	
105.0	26	SS			104.9 Gravel while drilling	
106.5		RB			106.5 Weathered bedrock - extremely dense	

End of Boring
Boring advanced from to 5 feet by hand auger
Boring advanced from 5 to 10 feet by power auger
Boring advanced from 10 to 106.5 feet by rock bit and drilling fluid
Temporary HW casing driven to 12.5 feet
Standard Penetration Test performed with automatic hammer
Boring backfilled with bentonite chips to 20 feet and bentonite grout from 20 to 106.5 feet

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

NORTHING: **247522.418**	BORING STARTED: **1/17/19**	AECOM OFFICE: **Oshkosh**	
EASTING: **2482234.003**	BORING COMPLETED: **1/18/19**	ENTERED BY: **MLB**	SHEET NO.: **2** OF **2**
WL: **9.0 WD**	RIG/FOREMAN: **D-50/JD (SES)**	APP'D BY: **JMT**	AECOM JOB NO.: **60594990**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM

OWNER: **Georgia-Pacific**

LOG OF BORING NUMBER: **B-102**

PROJECT NAME: **P-2 GP Broadway Mill**

ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)

DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
					SURFACE ELEVATION +587.04 NAVD88	
		HA			Fill: Coal and cinders	
	1	HA			3.0	
5.0		HA			Fill: Silty clay - trace wood - light brown (CL-ML)	
	2	HA				
		PA				
	3	SS			9.5	
10.0		PA			Clay - trace gravel - light brown to light reddish brown - very stiff to hard (CL)	
	4	SS				
		PA				
	5	SS			14.5	
15.0		PA			Clay - trace gravel - brown - very stiff (CL)	
	6	SS				
		RB				
	7	SS				
20.0		RB				
	8	SS			22.0	
		RB				
	9	SS			Clay - trace sand and gravel - brown - medium to stiff (CL-CH)	
25.0		RB				
	10	ST				
		RB				
30.0						
	11	SS				
		RB				
35.0						
	12	SS				
		RB				
40.0						
	13	SS				
		RB				
45.0						
	14	ST				
		RB				
50.0						
	15	SS				
		RB				
55.0						
	16	ST				
		RB				
60.0						

. . . continued

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

AECOM JOB NO. **60594990**

SHEET NO. **1** OF **2**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM	OWNER: **Georgia-Pacific**	LOG OF BORING NUMBER: **B-102**
	PROJECT NAME: **P-2 GP Broadway Mill**	ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)

DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
					SURFACE ELEVATION +587.04 NAVD88 (Continued)	
	17	SS			Clay - trace sand and gravel - brown - medium to stiff (CL-CH)	WOH
		RB				
65.0	18	SS				tv6
		RB				
70.0	19	SS				7
		RB				
75.0	20	SS				
	20	SS			75.5 Silty sand with gravel - brown - extremely to very dense - wet (SM)	
		RB				
80.0	21	SS				57
		RB			84.0	
85.0	22	SS			Silty sandy clay with gravel - brown - stiff (CL-ML)	32
		RB			88.5	
90.0	23	SS			Clay - reddish brown to grayish brown - medium to very stiff (CL-CH)	tv 15
		RB				
95.0	24	ST				
		RB			98.5	
100.0	25	SS			Clay - trace sand and silt seams - reddish brown to gray - stiff (CL)	19
		RB			104.7	
105.0						
107.0					107.0 Drillers note: Hard drilling from 104.7 to 105.5 Drillers note: Rock bit refusal at 107 feet End of Boring Boring advanced from to 5.5 feet by hand auger Boring advanced from 5.5 to 15 feet by power auger Boring advanced from 15 to 107 feet by rock bit and drilling fluid Temporary HW casing driven to 15 feet Standard Penetration Test performed with automatic hammer Boring backfilled with bentonite chips to 15 feet and bentonite grout from 15 to 107 feet	

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

NORTHING: **247355.184**	BORING STARTED: **1/21/19**	AECOM OFFICE: **Oshkosh**	
EASTING: **2482663.693**	BORING COMPLETED: **1/22/19**	ENTERED BY: **MLB**	SHEET NO.: **2** OF **2**
WL: **13.0 WS / 14.3 BCI**	RIG/FOREMAN: **D-50/JD (SES)**	APP'D BY: **JMT**	AECOM JOB NO.: **60594990**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM	OWNER: **Georgia-Pacific**	LOG OF BORING NUMBER: **B-103**
	PROJECT NAME: **P-2 GP Broadway Mill**	ARCHITECT-ENGINEER: **AECOM**

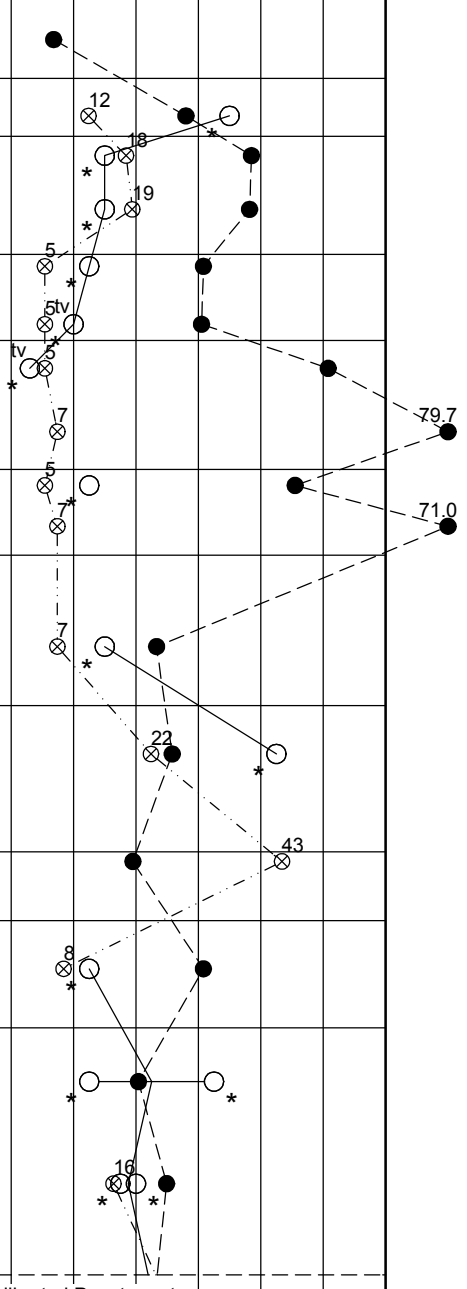
SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)

DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE / RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
				SURFACE ELEVATION +586.75 NAVD88	
		HA		Coal	
	1	HA			
		HA		4.3	
5.0					
	2	SS		Fill: Silty clay - trace coal - light brown to reddish brown - very stiff (CL-ML)	
		PA		7.0	
	3	SS		Fill: Clay with gravel and wood - brown - stiff (CL)	
10.0		PA			
	4	SS		Wood in sample 4	
		PA		12.5	
	5	SS		Fill: Clay with wood - brown - stiff to medium (CH-CL)	
15.0		PA			
	6	SS		16.5	
		RB		Organic sandy silt - trace shells and gravel - brown to black - soft (ML-OL)	
	7	SS			
20.0		RB			
	8	SS			
		RB		22.5	
	9	SS		Slightly organic clay - gray to browinsh gray - stiff (CL-OL)	
25.0		RB			
	10	SS		26.5	
		RB		Sandy silty clay - grayish brown to brown - stiff (CL)	
30.0					
	11	SS			
		RB		33.5	
35.0				Clay - reddish brown - hard (CL)	
	12	SS			
		RB			
40.0				40.3	
	13	SS		sandy silt - brown - dense - wet (ML)	
		RB		43.5	
45.0				Clay - trace sand - dark reddish brown - stiff (CL)	
	14	SS			
		RB		48.5	
50.0				Clay - grayish brown to reddish brown - stiff to very stiff (CL)	
	15	ST			
		RB			
55.0					
	16	SS			
		RB			
60.0					
				. . . continued	



* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

AECOM JOB NO. **60594990** | SHEET NO. **1** OF **2**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM	OWNER: **Georgia-Pacific**	LOG OF BORING NUMBER: **B-103**
	PROJECT NAME: **P-2 GP Broadway Mill**	ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}	UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5) / PLASTIC LIMIT % / WATER CONTENT % / LIQUID LIMIT % (10 20 30 40 50) / STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)
					SURFACE ELEVATION +586.75 NAVD88 (Continued)		
	17	SS			Clay - grayish brown to reddish brown - stiff to very stiff (CL)		24
		RB			63.5		
65.0	18	SS			Clay - trace sand and gravel - trace silt seams - brown to reddish brown - stiff to very stiff (CL-CH)		tv 6
		RB					
70.0	19	ST					
		RB					
75.0	20	SS					WOH
		RB					
80.0	21	ST					
		RB					
85.0	22	SS					5
		RB					
90.0	23	ST					
		RB			94.0		
95.0	24	SS			Silty sand with gravel - gray - very dense - wet (SM)		58
		RB					
100.0	25	SS					79
		RB			104.8		
105.0					105.8 Possible Bedrock		

Drillers note: Rock bit refusal at 104.8, drilled to 105.8

End of Boring

Boring advanced from to 5.5 feet by hand auger
Boring advanced from 5.5 to 15 feet by power auger
Boring advanced from 15 to 105.8 feet by rock bit and drilling fluid
Temporary HW casing driven to 25 feet
Standard Penetration Test performed with automatic hammer
Boring backfilled with bentonite chips to 15 feet and bentonite grout from 15 to 105.8 feet

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

NORTHING: **247242.367**	BORING STARTED: **1/22/19**	AECOM OFFICE: **Oshkosh**	
EASTING: **2482881.499**	BORING COMPLETED: **1/24/19**	ENTERED BY: **MLB**	SHEET NO.: **2** OF **2**
WL: **13.3 WS**	RIG/FOREMAN: **D-50/JD (SES)**	APP'D BY: **JMT**	AECOM JOB NO.: **60594990**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM

OWNER: **Georgia-Pacific**

LOG OF BORING NUMBER: **B-104A**

PROJECT NAME: **P-2 GP Broadway Mill**

ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

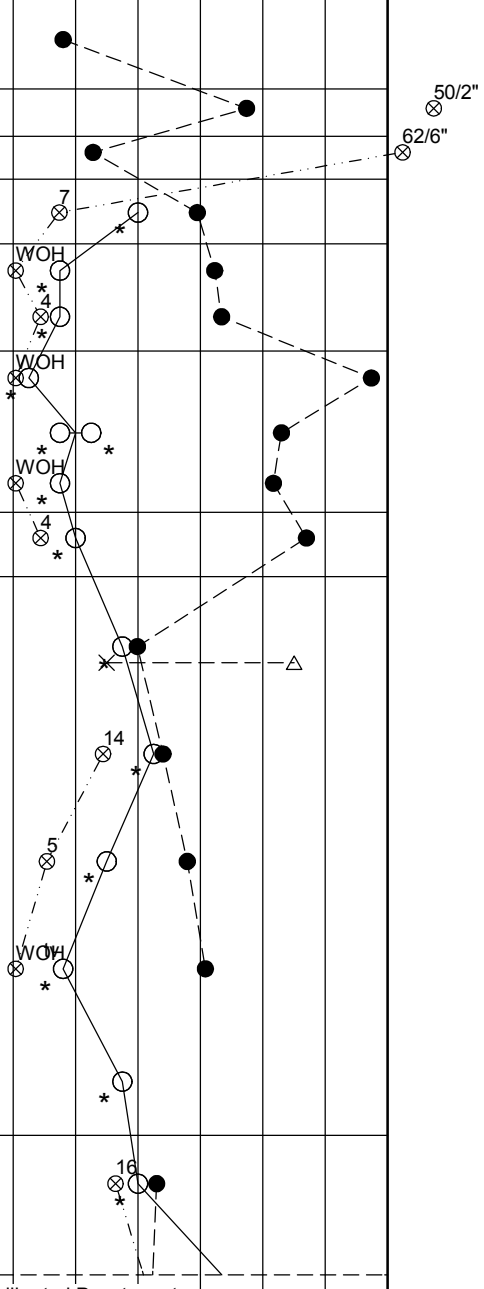
SURFACE ELEVATION +587.10 NAVD88

DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
		HA			Coal	
	1	HA				
5.0		HA			4.8	
	2	SS			Fill: Silty sand with coal - brown to brownish green - extremely dense - moist to wet (SM)	
		PA			7.0	
	3	SS			Fill: Silty sand and gravel - gray - extremely dense - wet (GM-SM)	
		PA			9.0	
10.0	4	SS			Fill: Silty clay - trace coal - very stiff (CL-ML)	
		RB			12.0	
	5	SS			Fill: Silty sandy clay - trace plant roots - brown - medium (CL-ML)	
15.0		RB				
	6	SS			17.0	
		RB				
	7	SS			Organic sandy clay - trace shells and plant roots - greenish gray - soft to stiff (CH-OH)	
20.0		RB				
	8	ST				
		RB				
	9	SS			24.5	
25.0		RB				
	10	SS			Organic silty clay - trace sand and shells - gray to dark brown - stiff (CL-OL)	
		RB			27.5	
30.0					Clay - trace gravel - reddish brown to brown - very stiff to medium (CL-CH)	
	11	ST				
		RB				
35.0						
	12	SS				
		RB				
40.0						
	13	SS				
		RB				
45.0						
	14	SS				
		RB				
50.0						
	15	ST				
		RB			53.5	
55.0					Clay - trace gravel - brown - very stiff (CL)	
	16	SS				
		RB				
60.0						

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)



. . . continued

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

AECOM JOB NO. **60594990**

SHEET NO. **1** OF **2**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM	OWNER: **Georgia-Pacific**	LOG OF BORING NUMBER: **B-104A**
	PROJECT NAME: **P-2 GP Broadway Mill**	ARCHITECT-ENGINEER: **AECOM**

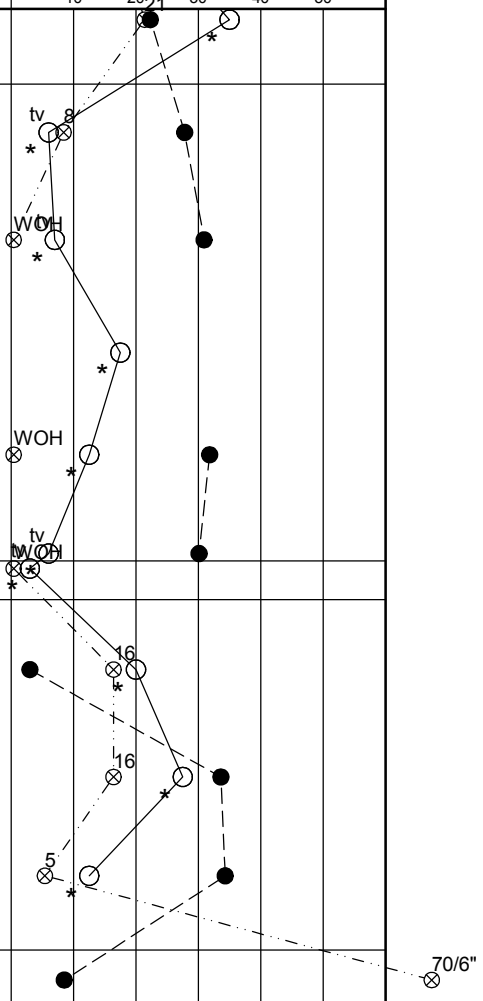
SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % | WATER CONTENT % | LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)

DEPTH(FT)	ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
						SURFACE ELEVATION +587.10 NAVD88 (Continued)	
		17	SS			Clay - trace gravel - brown - very stiff (CL)	
			RB				
						63.5	
65.0		18	SS			Clay - brown - medium to stiff (CL-CH)	
			RB				
70.0		19	SS				
			RB				
75.0		20	ST				
			RB				
80.0		21	SS				
			RB				
85.0		22	SS			85.7	
		22	SS			Clay - reddish brown - soft (CL)	
			RB			87.5	
90.0		23	SS			Clay - trace sand - reddish brown to gray - very stiff to stiff (CL)	
			RB				
95.0		24	SS				
			RB				
100.0		25	SS				
			RB			103.8	
105.0		26	SS			Silty sand and gravel - gray - extremely dense - wet (SM-GM)	
106.4			RB			106.4 Drillers note: Rock bit refusal at 106.2 feet due to boulder or bedrock	
						End of Boring	
						Boring advanced from to 5.5 feet by hand auger	
						Boring advanced from 5.5 to 10 feet by power auger	
						Boring advanced from 10 to 106.2 feet by rock bit and drilling fluid	
						Temporary HW casing driven to 15 feet	
						Standard Penetration Test performed with automatic hammer	
						Boring backfilled with bentonite chips to 15 feet and bentonite grout from 15 to 106.4 feet	



* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

NORTHING **247000.699**	BORING STARTED **1/24/19**	AECOM OFFICE **Oshkosh**	
EASTING **2482628.539**	BORING COMPLETED **2/5/19**	ENTERED BY **MLB**	SHEET NO. **2** OF **2**
WL **5.0 WS / 4.5 BCI**	RIG/FOREMAN **D-50/JD (SES)**	APP'D BY **JMT**	AECOM JOB NO. **60594990**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

AECOM	OWNER: **Georgia-Pacific**	LOG OF BORING NUMBER: **B-105** — **Boring offset 2 ft. south**
	PROJECT NAME: **P-2 GP Broadway Mill**	ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)

DEPTH(FT) / ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
					SURFACE ELEVATION +588.49 NAVD88	
		HA			Coal	
5.0					5.2	
	1	SS			Fill: Clay - light brown to brown - very stiff (CL)	
		PA				
	2	SS				
10.0		PA			9.5	
	3	SS			Slightly orgranic clay - trace shells - gray - stiff (CL-OL)	
		RB			12.0	
	4	SS			Clay - trace sand - reddish brown to brown - stiff (CL)	
15.0		RB			14.5	
	5	SS			Clay - trace gravel - reddish brown to brown - very stiff to hard (CL)	
		RB				
	6	SS				
20.0		RB				
	7	SS				
		RB				
	8	SS				
25.0		RB				
	9	SS				
		RB			28.5	
30.0					Clay - reddish brown - very stiff (CL)	
	10	SS				
		RB			33.5	
35.0					Clay - reddish brown to brown -stiff to medium (CL)	
	11	SS				
		RB				
40.0	12	SS				
		RB				
45.0	13	ST				
		RB			48.5	
50.0					Clay - brown to grayish brown - medium to very stiff (CL)	
	14	SS				
		RB				
55.0	15	SS				
		RB				
60.0						

. . . continued

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

AECOM JOB NO. **60594990** | SHEET NO. **1** OF **2**

AECOM	OWNER: **Georgia-Pacific**	LOG OF BORING NUMBER: **B-105** — **Boring offset 2 ft. south**
	PROJECT NAME: **P-2 GP Broadway Mill**	ARCHITECT-ENGINEER: **AECOM**

SITE LOCATION: **GP Broadway Mill, Green Bay, Wisconsin**

UNCONFINED COMPRESSIVE STRENGTH TONS/FT.^{2} (1 2 3 4 5)

PLASTIC LIMIT % — WATER CONTENT % — LIQUID LIMIT % (10 20 30 40 50)

STANDARD PENETRATION BLOWS/(FT) (10 20 30 40 50)

DEPTH(FT)	ELEVATION(FT)	SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY	DESCRIPTION OF MATERIAL	UNIT DRY WT. LBS./FT.^{3}
						SURFACE ELEVATION +588.49 NAVD88 (Continued)	
		16	ST			Clay - brown to grayish brown - medium to very stiff (CL)	
			RB				
65.0		17	SS				
			RB				
70.0		18	ST				
			RB				
75.0		19	SS				
			RB				
80.0		20	ST				
			RB				
85.0		21	SS				
			RB			87.5	
90.0		22	SS			Clay - brown to reddish brown - stiff (CL)	
			RB				
95.0		23	SS			Trace sand and gravel in sample 23	
			RB			98.5	
100.0		24	SS			Clay - reddish brown - stiff (CL)	
			RB			104.5	
105.0		25	SS			Silty sand and gravel - gray - extremely dense - wet	
106.7			RB			106.7 (SM-GM)	

Drillers note: Hard drilling at 105.7 feet. Rock bit refusal at 106.7 feet

End of Boring

Boring advanced from to 5.2 feet by hand auger
Boring advanced from 5.2 to 10 feet by power auger
Boring advanced from 10 to 106.7 feet by rock bit and drilling fluid
Temporary HW casing driven to 12.5 feet
Standard Penetration Test performed with automatic hammer
Boring backfilled with bentonite chips to 15 feet and bentonite grout from 15 to 106.7 feet

WOH
WOH
WOH
20
50
7
60/2"

* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

NORTHING **246560.782**	BORING STARTED **2/5/19**	AECOM OFFICE **Oshkosh**	
EASTING **2482440.815**	BORING COMPLETED **2/7/19**	ENTERED BY **MLB**	SHEET NO. **2** OF **2**
WL **5.0 WS**	RIG/FOREMAN **D-50/JD (SES)**	APP'D BY **JMT**	AECOM JOB NO. **60594990**

AECOM LOG 60594990_P-2 GP BROADWAY MILL.GPJ FS_DATATEMPLATE.GDT 2/27/19

Attachment B

Analytical Report from Northern Lake Service, Inc.

NORTHERN LAKE SERVICE, INC.
Analytical Laboratory and Environmental Services
400 North Lake Avenue - Crandon, WI 54520
Ph: (715)-478-2777 Fax: (715)-478-3060

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. WI00034

Client: **Georgia-Pacific Consumer Products LP**
Attn: Mike Moore
1919 South Broadway
P O Box 19130
Green Bay, WI 54307 9130

Project revised on: 04/25/2019 ** See note below ** NLS Project: 315265
NLS Customer: 91089
Fax: 920 438 2804 PO # 1547401

Project: GBB Soil

101 NLS ID: 1102921
COC: 224490:1 Matrix: SO
Collected: 01/24/19 14:00 Received: 01/25/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Solids, total on solids	87.7	%	1	0.10*		01/31/19	SM 2540-G 20ed	721026460	EMT
TCLP Extraction	yes					01/28/19	SW846 1311	721026460	JDO
TCLP Zero Head Space Extraction	yes					01/28/19	SW846 1311	721026460	JDO
Flashpoint	>140	Deg. F	1		*	02/05/19	EPA 1010A	157066030	DMD
PCBs (solid) by SW846 8082	see attached					02/27/19	SW846 8082	721026460	CSC
Organics Extraction (Soil) for PCBs	yes					02/18/19	SW846 3546	721026460	EMT

TCLP 101 NLS ID: 1102922
COC: 224490:1 Matrix: EX
Collected: 01/29/19 12:30 Received: 01/29/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Arsenic, tot. recoverable on extract as As by ICP	ND	ug/L	10	49*	160*	01/31/19	SW846 6010	721026460	JDO
Barium, tot. recoverable on extract as Ba by ICP	710	ug/L	10	12*	40*	01/31/19	SW846 6010	721026460	JDO
Cadmium, tot. recoverable on extract as Cd by ICP	ND	ug/L	10	1.9	6.1	01/31/19	SW846 6010	721026460	JDO
Chromium, tot. recoverable on extract as Cr by ICP	ND	ug/L	10	8.3	28	01/31/19	SW846 6010	721026460	JDO
Lead, tot. recoverable on extract as Pb by ICP	ND	ug/L	10	43	140	01/31/19	SW846 6010	721026460	JDO
Mercury by CVAA	ND	ug/L	1	0.47	1.5	02/03/19	EPA 245.1, Rev 3	721026460	RS
Selenium, tot. recoverable on extract as Se by ICP	ND	ug/L	10	120	400	01/31/19	SW846 6010	721026460	JDO
Silver, tot. recoverable on extract as Ag by ICP	ND	ug/L	10	8.1	27	01/31/19	SW846 6010	721026460	JDO
Metals digestion - tot. recov.ICP	yes					01/29/19	SW846 3005M	721026460	JDO
TCLP VOC by EPA Method 8260B	see attached					02/01/19	SW846 8260	721026460	JLG
Acid/Base Extraction for GC/MS	yes					01/31/19	SW846 3510C	721026460	EMT
Semi-Volatiles TCLP by EPA Method 8270C	see attached					02/08/19	SW846 8270	721026460	RW

102 NLS ID: 1102923
COC: 224491:2 Matrix: SO
Collected: 01/24/19 14:00 Received: 01/25/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Solids, total on solids	81.6	%	1	0.10*		01/31/19	SM 2540-G 20ed	721026460	EMT
TCLP Extraction	yes					01/28/19	SW846 1311	721026460	JDO
TCLP Zero Head Space Extraction	yes					01/28/19	SW846 1311	721026460	JDO
Flashpoint	>140	Deg. F	1		*	02/05/19	EPA 1010A	157066030	DMD
PCBs (solid) by SW846 8082	see attached					02/14/19	SW846 8082	721026460	CSC
Organics Extraction (Soil) for PCBs	yes					01/30/19	SW846 3546	721026460	CSC

NORTHERN LAKE SERVICE, INC.
Analytical Laboratory and Environmental Services
400 North Lake Avenue - Crandon, WI 54520
Ph: (715)-478-2777 Fax: (715)-478-3060

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. WI00034

Client: **Georgia-Pacific Consumer Products LP**
Attn: Mike Moore
1919 South Broadway
P O Box 19130
Green Bay, WI 54307 9130

Project revised on: 04/25/2019 ** See note below ** NLS Project: 315265
NLS Customer: 91089
Fax: 920 438 2804 PO # 1547401

Project: GBB Soil

TCLP 102 NLS ID: 1102924
COC: 224491:2 Matrix: EX
Collected: 01/29/19 12:45 Received: 01/29/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Arsenic, tot. recoverable on extract as As by ICP	ND	ug/L	10	49*	160*	01/31/19	SW846 6010	721026460	JDO
Barium, tot. recoverable on extract as Ba by ICP	210	ug/L	10	12*	40*	01/31/19	SW846 6010	721026460	JDO
Cadmium, tot. recoverable on extract as Cd by ICP	[2.8]	ug/L	10	1.9	6.1	01/31/19	SW846 6010	721026460	JDO
Chromium, tot. recoverable on extract as Cr by ICP	ND	ug/L	10	8.3	28	01/31/19	SW846 6010	721026460	JDO
Lead, tot. recoverable on extract as Pb by ICP	ND	ug/L	10	43	140	01/31/19	SW846 6010	721026460	JDO
Mercury by CVAA	ND	ug/L	1	0.47	1.5	02/03/19	EPA 245.1, Rev 3	721026460	RS
Selenium, tot. recoverable on extract as Se by ICP	ND	ug/L	10	120	400	01/31/19	SW846 6010	721026460	JDO
Silver, tot. recoverable on extract as Ag by ICP	ND	ug/L	10	8.1	27	01/31/19	SW846 6010	721026460	JDO
Metals digestion - tot. recov.ICP	yes					01/29/19	SW846 3005M	721026460	JDO
TCLP VOC by EPA Method 8260B	see attached					02/01/19	SW846 8260	721026460	JLG
Acid/Base Extraction for GC/MS	yes					01/31/19	SW846 3510C	721026460	EMT
Semi-Volatiles TCLP by EPA Method 8270C	see attached					02/08/19	SW846 8270	721026460	RW

103 NLS ID: 1102925
COC: 224491:3 Matrix: SO
Collected: 01/24/19 14:00 Received: 01/25/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Solids, total on solids	82.9	%	1	0.10*		01/31/19	SM 2540-G 20ed	721026460	EMT
TCLP Extraction	yes					01/29/19	SW846 1311	721026460	JDO
TCLP Zero Head Space Extraction	yes					01/29/19	SW846 1311	721026460	JDO
Flashpoint	>140	Deg. F	1		*	02/05/19	EPA 1010A	157066030	DMD
PCBs (solid) by SW846 8082	see attached					02/14/19	SW846 8082	721026460	CSC
Organics Extraction (Soil) for PCBs	yes					01/30/19	SW846 3546	721026460	CSC

TCLP 103 NLS ID: 1102926
COC: 224491:3 Matrix: EX
Collected: 01/30/19 12:00 Received: 01/30/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Arsenic, tot. recoverable on extract as As by ICP	ND	ug/L	10	49*	160*	01/31/19	SW846 6010	721026460	JDO
Barium, tot. recoverable on extract as Ba by ICP	450	ug/L	10	12*	40*	01/31/19	SW846 6010	721026460	JDO
Cadmium, tot. recoverable on extract as Cd by ICP	ND	ug/L	10	1.9	6.1	01/31/19	SW846 6010	721026460	JDO
Chromium, tot. recoverable on extract as Cr by ICP	ND	ug/L	10	8.3	28	01/31/19	SW846 6010	721026460	JDO
Lead, tot. recoverable on extract as Pb by ICP	ND	ug/L	10	43	140	01/31/19	SW846 6010	721026460	JDO
Mercury by CVAA	ND	ug/L	1	0.47	1.5	02/03/19	EPA 245.1, Rev 3	721026460	RS
Selenium, tot. recoverable on extract as Se by ICP	ND	ug/L	10	120	400	01/31/19	SW846 6010	721026460	JDO
Silver, tot. recoverable on extract as Ag by ICP	ND	ug/L	10	8.1	27	01/31/19	SW846 6010	721026460	JDO
Metals digestion - tot. recov.ICP	yes					01/30/19	SW846 3005M	721026460	JDO
TCLP VOC by EPA Method 8260B	see attached					02/01/19	SW846 8260	721026460	JLG
Acid/Base Extraction for GC/MS	yes					01/31/19	SW846 3510C	721026460	EMT
Semi-Volatiles TCLP by EPA Method 8270C	see attached					02/08/19	SW846 8270	721026460	RW

NORTHERN LAKE SERVICE, INC.
Analytical Laboratory and Environmental Services
400 North Lake Avenue - Crandon, WI 54520
Ph: (715)-478-2777 Fax: (715)-478-3060

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. WI00034

Client: **Georgia-Pacific Consumer Products LP**
Attn: Mike Moore
1919 South Broadway
P O Box 19130
Green Bay, WI 54307 9130

Project revised on: 04/25/2019 ** See note below ** NLS Project: 315265
NLS Customer: 91089
Fax: 920 438 2804 PO # 1547401

Project: GBB Soil

104 NLS ID: 1102927
COC: 224491:4 Matrix: SO
Collected: 01/24/19 14:00 Received: 01/25/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Solids, total on solids	70.1	%	1	0.10*		01/31/19	SM 2540-G 20ed	721026460	EMT
TCLP Extraction	yes					01/29/19	SW846 1311	721026460	JDO
TCLP Zero Head Space Extraction	yes					01/29/19	SW846 1311	721026460	JDO
Flashpoint	>140	Deg. F	1		*	02/05/19	EPA 1010A	157066030	DMD
PCBs (solid) by SW846 8082	see attached					02/14/19	SW846 8082	721026460	CSC
Organics Extraction (Soil) for PCBs	yes					01/30/19	SW846 3546	721026460	CSC

TCLP 104 NLS ID: 1102928
COC: 224491:4 Matrix: EX
Collected: 01/30/19 12:30 Received: 01/30/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Arsenic, tot. recoverable on extract as As by ICP	ND	ug/L	10	49*	160*	01/31/19	SW846 6010	721026460	JDO
Barium, tot. recoverable on extract as Ba by ICP	330	ug/L	10	12*	40*	01/31/19	SW846 6010	721026460	JDO
Cadmium, tot. recoverable on extract as Cd by ICP	ND	ug/L	10	1.9	6.1	01/31/19	SW846 6010	721026460	JDO
Chromium, tot. recoverable on extract as Cr by ICP	ND	ug/L	10	8.3	28	01/31/19	SW846 6010	721026460	JDO
Lead, tot. recoverable on extract as Pb by ICP	ND	ug/L	10	43	140	01/31/19	SW846 6010	721026460	JDO
Mercury by CVAA	ND	ug/L	1	0.47	1.5	02/03/19	EPA 245.1, Rev 3	721026460	RS
Selenium, tot. recoverable on extract as Se by ICP	ND	ug/L	10	120	400	01/31/19	SW846 6010	721026460	JDO
Silver, tot. recoverable on extract as Ag by ICP	ND	ug/L	10	8.1	27	01/31/19	SW846 6010	721026460	JDO
Metals digestion - tot. recov.ICP	yes					01/30/19	SW846 3005M	721026460	JDO
TCLP VOC by EPA Method 8260B	see attached					02/01/19	SW846 8260	721026460	JLG
Acid/Base Extraction for GC/MS	yes					01/31/19	SW846 3510C	721026460	EMT
Semi-Volatiles TCLP by EPA Method 8270C	see attached					02/12/19	SW846 8270	721026460	RW

Values in brackets represent results greater than or equal to the LOD but less than the LOQ and are within a region of "Less-Certain Quantitation". Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". LOD and/or LOQ tagged with an asterisk(*) are considered Reporting Limits. All LOD/LOQs adjusted to reflect dilution and/or solids content.
ND = Not Detected (< LOD) LOD = Limit of Detection LOQ = Limit of Quantitation NA = Not Applicable
DWB = Dry Weight Basis %DWB = (mg/kg DWB) / 10000 1000 ug/L = 1 mg/L
MCL = Maximum Contaminant Levels for Drinking Water Samples. Shaded results indicate >MCL.

Reviewed by:

Authorized by:
R. T. Krueger
President

Revision note: Added comment to MEK results

NORTHERN LAKE SERVICE, INC.
Analytical Laboratory and Environmental Services
400 North Lake Avenue - Crandon, WI 54520
Ph: (715)-478-2777 Fax: (715)-478-3060

ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. WI00034

Client: **Georgia-Pacific Consumer Products LP**
Attn: Mike Moore
1919 South Broadway
P O Box 19130
Green Bay, WI 54307 9130

Project revised on: 04/26/2019 ** See note below ** NLS Project: 315831
NLS Customer: 91089
Fax: 920 438 2804 PO # 01547401

Project: GBB Soil (1)

105 NLS ID: 1104367
COC: 224059:1 Matrix: SL
Collected: 02/05/19 16:30 Received: 02/11/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Solids, total on solids	81.8	%	1	0.10*		02/11/19	SM 2540-G 20ed	721026460	EMT
TCLP Extraction	yes					02/12/19	SW846 1311	721026460	JDO
TCLP Zero Head Space Extraction	yes					02/12/19	SW846 1311	721026460	JDO
Flashpoint	>140.0	Deg. F	1		*	02/14/19	EPA 1010	157066030	DMD
PCBs (solid) by SW846 8082	see attached					02/27/19	SW846 8082	721026460	CSC
Organics Extraction (Soil) for PCBs	yes					02/18/19	SW846 3546	721026460	EMT

TCLP 105 NLS ID: 1104368
COC: 224059:1 Matrix: EX
Collected: 02/13/19 12:20 Received: 02/13/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab	
Arsenic, tot. recoverable on extract as As by ICP	ND	ug/L	10	49*	160*	02/14/19	SW846 6010	721026460	JDO
Barium, tot. recoverable on extract as Ba by ICP	370	ug/L	10	12*	40*	02/14/19	SW846 6010	721026460	JDO
Cadmium, tot. recoverable on extract as Cd by ICP	[2.1]	ug/L	10	1.9	6.1	02/14/19	SW846 6010	721026460	JDO
Chromium, tot. recoverable on extract as Cr by ICP	ND	ug/L	10	8.3	28	02/14/19	SW846 6010	721026460	JDO
Lead, tot. recoverable on extract as Pb by ICP	ND	ug/L	10	43	140	02/14/19	SW846 6010	721026460	JDO
Mercury by CVAA	ND	ug/L	1	0.47	1.5	02/23/19	EPA 245.1, Rev 3	721026460	RS
Selenium, tot. recoverable on extract as Se by ICP	ND	ug/L	10	120	400	02/14/19	SW846 6010	721026460	JDO
Silver, tot. recoverable on extract as Ag by ICP	ND	ug/L	10	8.1	27	02/14/19	SW846 6010	721026460	JDO
Metals digestion - tot. recov.ICP	yes					02/13/19	SW846 3005M	721026460	JDO
TCLP VOC by EPA Method 8260B	see attached					02/15/19	SW846 8260	721026460	JLG
Acid/Base Extraction for GC/MS	yes					02/15/19	SW846 3510C	721026460	EMT
Semi-Volatiles TCLP by EPA Method 8270C	see attached					02/22/19	SW846 8270	721026460	RW

Values in brackets represent results greater than or equal to the LOD but less than the LOQ and are within a region of "Less-Certain Quantitation". Results greater than or equal to the LOQ are considered to be in the region of "Certain Quantitation". LOD and/or LOQ tagged with an asterisk(*) are considered Reporting Limits. All LOD/LOQs adjusted to reflect dilution and/or solids content.
ND = Not Detected (< LOD) LOD = Limit of Detection LOQ = Limit of Quantitation NA = Not Applicable
DWB = Dry Weight Basis %DWB = (mg/kg DWB) / 10000 1000 ug/L = 1 mg/L
MCL = Maximum Contaminant Levels for Drinking Water Samples. Shaded results indicate >MCL.

Reviewed by:

Authorized by:
R. T. Krueger
President

Revision note: Added comment to MEK result.

ANALYTICAL RESULTS: Semi-Volatile Organic TCLP Compounds by GC/MS

Customer: Georgia-Pacific Consumer Products LP **NLS Project: 315265 PO # 1547401**

Project Description: GBB Soil

Project Title: **Template: SVTCLP** **Printed: 04/25/2019 15:14** **Analyst: RW**

Sample: 1102922 TCLP 101 Collected: 01/29/19 Analyzed: 02/08/19 - Analytes: 12

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Pyridine	ND	ug/L	1	1.7	5.7	
2-Methylphenol (o-Cresol)	ND	ug/L	1	0.74	2.5	
3 & 4-Methylphenol (m/p-Cresol)	ND	ug/L	1	1.4	4.6	
Nitrobenzene	ND	ug/L	1	0.82	2.7	
1,4-Dichlorobenzene	ND	ug/L	1	0.98	3.3	
2,4,6-Trichlorophenol	ND	ug/L	1	1.1	3.5	
2,4,5-Trichlorophenol	ND	ug/L	1	0.80	2.7	
2,4-Dinitrotoluene	ND	ug/L	1	0.84	2.8	
Hexachlorobutadiene	ND	ug/L	1	0.41	1.4	
Hexachloroethane	ND	ug/L	1	0.67	2.2	
Hexachlorobenzene	ND	ug/L	1	0.69	2.3	
Pentachlorophenol	ND	ug/L	1	0.70	2.3	
2-Fluorophenol (SURR)	57%		1			S
Phenol-d5 (SURR)	45%		1			S
Nitrobenzene-d5 (SURR)	86%		1			S
2-Fluorobiphenyl (SURR)	82%		1			S
2,4,6-Tribromophenol (SURR)	86%		1			S
Terphenyl-d14 (SURR)	83%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

Sample: 1102924 TCLP 102 Collected: 01/29/19 Analyzed: 02/08/19 - Analytes: 12

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Pyridine	ND	ug/L	1	1.7	5.7	
2-Methylphenol (o-Cresol)	ND	ug/L	1	0.74	2.5	
3 & 4-Methylphenol (m/p-Cresol)	ND	ug/L	1	1.4	4.6	
Nitrobenzene	ND	ug/L	1	0.82	2.7	
1,4-Dichlorobenzene	ND	ug/L	1	0.98	3.3	
2,4,6-Trichlorophenol	ND	ug/L	1	1.1	3.5	
2,4,5-Trichlorophenol	ND	ug/L	1	0.80	2.7	
2,4-Dinitrotoluene	ND	ug/L	1	0.84	2.8	
Hexachlorobutadiene	ND	ug/L	1	0.41	1.4	
Hexachloroethane	ND	ug/L	1	0.67	2.2	
Hexachlorobenzene	ND	ug/L	1	0.69	2.3	
Pentachlorophenol	ND	ug/L	1	0.70	2.3	
2-Fluorophenol (SURR)	58%		1			S
Phenol-d5 (SURR)	39%		1			S
Nitrobenzene-d5 (SURR)	92%		1			S
2-Fluorobiphenyl (SURR)	85%		1			S
2,4,6-Tribromophenol (SURR)	88%		1			S
Terphenyl-d14 (SURR)	81%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: Semi-Volatile Organic TCLP Compounds by GC/MS
Customer: Georgia-Pacific Consumer Products LP NLS Project: 315265 PO # 1547401
Project Description: GBB Soil
Project Title: Template: SVTCLP Printed: 04/25/2019 15:14 Analyst: RW

Sample: 1102926 TCLP 103 Collected: 01/30/19 Analyzed: 02/08/19 - Analytes: 12

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Pyridine	ND	ug/L	1	1.7	5.7	
2-Methylphenol (o-Cresol)	ND	ug/L	1	0.74	2.5	
3 & 4-Methylphenol (m/p-Cresol)	ND	ug/L	1	1.4	4.6	
Nitrobenzene	ND	ug/L	1	0.82	2.7	
1,4-Dichlorobenzene	ND	ug/L	1	0.98	3.3	
2,4,6-Trichlorophenol	ND	ug/L	1	1.1	3.5	
2,4,5-Trichlorophenol	ND	ug/L	1	0.80	2.7	
2,4-Dinitrotoluene	ND	ug/L	1	0.84	2.8	
Hexachlorobutadiene	ND	ug/L	1	0.41	1.4	
Hexachloroethane	ND	ug/L	1	0.67	2.2	
Hexachlorobenzene	ND	ug/L	1	0.69	2.3	
Pentachlorophenol	ND	ug/L	1	0.70	2.3	
2-Fluorophenol (SURR)	57%		1			S
Phenol-d5 (SURR)	39%		1			S
Nitrobenzene-d5 (SURR)	94%		1			S
2-Fluorobiphenyl (SURR)	90%		1			S
2,4,6-Tribromophenol (SURR)	91%		1			S
Terphenyl-d14 (SURR)	82%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:
S = This compound is a surrogate used to evaluate the quality control of a method.

Sample: 1102928 TCLP 104 Collected: 01/30/19 Analyzed: 02/12/19 - Analytes: 12

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Pyridine	ND	ug/L	1	1.7	5.7	
2-Methylphenol (o-Cresol)	ND	ug/L	1	0.74	2.5	
3 & 4-Methylphenol (m/p-Cresol)	ND	ug/L	1	1.4	4.6	
Nitrobenzene	ND	ug/L	1	0.82	2.7	
1,4-Dichlorobenzene	ND	ug/L	1	0.98	3.3	
2,4,6-Trichlorophenol	ND	ug/L	1	1.1	3.5	
2,4,5-Trichlorophenol	ND	ug/L	1	0.80	2.7	
2,4-Dinitrotoluene	ND	ug/L	1	0.84	2.8	
Hexachlorobutadiene	ND	ug/L	1	0.41	1.4	
Hexachloroethane	ND	ug/L	1	0.67	2.2	
Hexachlorobenzene	ND	ug/L	1	0.69	2.3	
Pentachlorophenol	ND	ug/L	1	0.70	2.3	
2-Fluorophenol (SURR)	52%		1			S
Phenol-d5 (SURR)	35%		1			S
Nitrobenzene-d5 (SURR)	89%		1			S
2-Fluorobiphenyl (SURR)	78%		1			S
2,4,6-Tribromophenol (SURR)	85%		1			S
Terphenyl-d14 (SURR)	79%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:
S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: Semi-Volatile Organic TCLP Compounds by GC/MS

Customer: Georgia-Pacific Consumer Products LP **NLS Project: 315831 PO # 01547401**

Project Description: GBB Soil (1)

Project Title: **Template: SVTCLP** **Printed: 04/26/2019 11:06** **Analyst: RW**

Sample: 1104368 TCLP 105 Collected: 02/13/19 Analyzed: 02/22/19 - Analytes: 12

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Pyridine	ND	ug/L	1	1.7	5.7	
2-Methylphenol (o-Cresol)	ND	ug/L	1	0.74	2.5	
3 & 4-Methylphenol (m/p-Cresol)	ND	ug/L	1	1.4	4.6	
Nitrobenzene	ND	ug/L	1	0.82	2.7	
1,4-Dichlorobenzene	ND	ug/L	1	0.98	3.3	
2,4,6-Trichlorophenol	ND	ug/L	1	1.1	3.5	
2,4,5-Trichlorophenol	ND	ug/L	1	0.80	2.7	
2,4-Dinitrotoluene	ND	ug/L	1	0.84	2.8	
Hexachlorobutadiene	ND	ug/L	1	0.41	1.4	
Hexachloroethane	ND	ug/L	1	0.67	2.2	
Hexachlorobenzene	ND	ug/L	1	0.69	2.3	
Pentachlorophenol	ND	ug/L	1	0.70	2.3	
2-Fluorophenol (SURR)	55%		1			S
Phenol-d5 (SURR)	36%		1			S
Nitrobenzene-d5 (SURR)	91%		1			S
2-Fluorobiphenyl (SURR)	83%		1			S
2,4,6-Tribromophenol (SURR)	86%		1			S
Terphenyl-d14 (SURR)	56%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.

ANALYTICAL RESULTS: VOC's by P&T/GCMS - TCLP - (VarSat2000)

Customer: Georgia-Pacific Consumer Products LP **NLS Project: 315265 PO # 1547401**

Project Description: GBB Soil

Project Title: **Template: SATTCLP** **Printed: 04/25/2019 15:14** **Analyst: JLG**

Sample: 1102922 TCLP 101 Collected: 01/29/19 Analyzed: 02/01/19 - Analytes: 11

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.24	0.84	
Carbon Tetrachloride	ND	ug/L	1	0.16	0.55	
Chlorobenzene	ND	ug/L	1	0.25	0.87	
Chloroform	ND	ug/L	1	0.22	0.78	
1,4-Dichlorobenzene	ND	ug/L	1	0.27	0.95	
1,2-Dichloroethane	ND	ug/L	1	0.22	0.78	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.69	
Tetrachloroethene	ND	ug/L	1	0.22	0.78	
Trichloroethene	ND	ug/L	1	0.32	1.1	
Vinyl chloride	ND	ug/L	1	0.17	0.60	
Methyl ethyl ketone	[1.8]	ug/L	1	0.57	2.0	J LB
Dibromofluoromethane (SURR)	114%		1			S
Toluene-d8 (SURR)	106%		1			S
1-Bromo-4-Fluorobenzene (SURR)	103%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

J = Result enclosed in brackets is between LOD and LOQ, a region of less certain quantitation.
S = This compound is a surrogate used to evaluate the quality control of a method.
LB = Compound is suspected of being a laboratory contaminant.

Sample: 1102924 TCLP 102 Collected: 01/29/19 Analyzed: 02/01/19 - Analytes: 11

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	ND	ug/L	1	0.24	0.84	
Carbon Tetrachloride	ND	ug/L	1	0.16	0.55	
Chlorobenzene	ND	ug/L	1	0.25	0.87	
Chloroform	ND	ug/L	1	0.22	0.78	
1,4-Dichlorobenzene	ND	ug/L	1	0.27	0.95	
1,2-Dichloroethane	ND	ug/L	1	0.22	0.78	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.69	
Tetrachloroethene	ND	ug/L	1	0.22	0.78	
Trichloroethene	ND	ug/L	1	0.32	1.1	
Vinyl chloride	ND	ug/L	1	0.17	0.60	
Methyl ethyl ketone	2.5	ug/L	1	0.57	2.0	LB
Dibromofluoromethane (SURR)	112%		1			S
Toluene-d8 (SURR)	119%		1			S
1-Bromo-4-Fluorobenzene (SURR)	107%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.
LB = Compound is suspected of being a laboratory contaminant.

ANALYTICAL RESULTS: VOC's by P&T/GCMS - TCLP - (VarSat2000)
Customer: Georgia-Pacific Consumer Products LP NLS Project: 315265 PO # 1547401
Project Description: GBB Soil
Project Title: Template: SATTCLP Printed: 04/25/2019 15:14 Analyst: JLG

Sample: 1102926 TCLP 103 Collected: 01/30/19 Analyzed: 02/01/19 - Analytes: 11

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	4.4	ug/L	1	0.24	0.84	
Carbon Tetrachloride	ND	ug/L	1	0.16	0.55	
Chlorobenzene	ND	ug/L	1	0.25	0.87	
Chloroform	ND	ug/L	1	0.22	0.78	
1,4-Dichlorobenzene	ND	ug/L	1	0.27	0.95	
1,2-Dichloroethane	ND	ug/L	1	0.22	0.78	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.69	
Tetrachloroethene	ND	ug/L	1	0.22	0.78	
Trichloroethene	ND	ug/L	1	0.32	1.1	
Vinyl chloride	ND	ug/L	1	0.17	0.60	
Methyl ethyl ketone	[1.5]	ug/L	1	0.57	2.0	J LB
Dibromofluoromethane (SURR)	114%		1			S
Toluene-d8 (SURR)	118%		1			S
1-Bromo-4-Fluorobenzene (SURR)	101%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:
J = Result enclosed in brackets is between LOD and LOQ, a region of less certain quantitation.
S = This compound is a surrogate used to evaluate the quality control of a method.
LB = Compound is suspected of being a laboratory contaminant.

Sample: 1102928 TCLP 104 Collected: 01/30/19 Analyzed: 02/01/19 - Analytes: 11

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	[0.55]	ug/L	1	0.24	0.84	J
Carbon Tetrachloride	ND	ug/L	1	0.16	0.55	
Chlorobenzene	ND	ug/L	1	0.25	0.87	
Chloroform	ND	ug/L	1	0.22	0.78	
1,4-Dichlorobenzene	ND	ug/L	1	0.27	0.95	
1,2-Dichloroethane	ND	ug/L	1	0.22	0.78	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.69	
Tetrachloroethene	ND	ug/L	1	0.22	0.78	
Trichloroethene	ND	ug/L	1	0.32	1.1	
Vinyl chloride	ND	ug/L	1	0.17	0.60	
Methyl ethyl ketone	[0.67]	ug/L	1	0.57	2.0	J LB
Dibromofluoromethane (SURR)	110%		1			S
Toluene-d8 (SURR)	104%		1			S
1-Bromo-4-Fluorobenzene (SURR)	102%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:
J = Result enclosed in brackets is between LOD and LOQ, a region of less certain quantitation.
S = This compound is a surrogate used to evaluate the quality control of a method.
LB = Compound is suspected of being a laboratory contaminant.

ANALYTICAL RESULTS: VOC's by P&T/GCMS - TCLP - (VarSat2000)

Customer: Georgia-Pacific Consumer Products LP **NLS Project: 315831 PO # 01547401**

Project Description: GBB Soil (1)

Project Title: **Template: SATTCLP** **Printed: 04/26/2019 11:05** **Analyst: JLG**

Sample: 1104368 TCLP 105 Collected: 02/13/19 Analyzed: 02/15/19 - Analytes: 11

ANALYTE NAME	RESULT	UNITS	DIL	LOD	LOQ	Note
Benzene	[0.50]	ug/L	1	0.24	0.84	J
Carbon Tetrachloride	ND	ug/L	1	0.16	0.55	
Chlorobenzene	ND	ug/L	1	0.25	0.87	
Chloroform	ND	ug/L	1	0.22	0.78	
1,4-Dichlorobenzene	ND	ug/L	1	0.27	0.95	
1,2-Dichloroethane	ND	ug/L	1	0.22	0.78	
1,1-Dichloroethene	ND	ug/L	1	0.20	0.69	
Tetrachloroethene	ND	ug/L	1	0.22	0.78	
Trichloroethene	ND	ug/L	1	0.32	1.1	
Vinyl chloride	ND	ug/L	1	0.17	0.60	
Methyl ethyl ketone	[0.59]	ug/L	1	0.57	2.0	J LB
Dibromofluoromethane (SURR)	100%		1			S
Toluene-d8 (SURR)	113%		1			S
1-Bromo-4-Fluorobenzene (SURR)	96%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

J = Result enclosed in brackets is between LOD and LOQ, a region of less certain quantitation.

S = This compound is a surrogate used to evaluate the quality control of a method.

LB = Compound is suspected of being a laboratory contaminant.

ANALYTICAL RESULTS: PCBs by GC

Customer: Georgia-Pacific Consumer Products LP **NLS Project: 315265 PO # 1547401**

Project Description: GBB Soil

Project Title: **Template: PCBS** **Printed: 04/25/2019 15:14** **Analyst: CSC**

Sample: 1102921 101 Collected: 01/24/19 Analyzed: 02/27/19 - 87.7%Solids Analytes: 8 | Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	25	79	
PCB-1221	ND	ug/Kg	5	57	190	
PCB-1232	ND	ug/Kg	5	32	110	
PCB-1242	490	ug/Kg	5	21	70	
PCB-1248	ND	ug/Kg	5	16	49	
PCB-1254	ND	ug/Kg	5	38	130	
PCB-1260	500	ug/Kg	5	31	98	
Total PCBs	990	ug/Kg	5	31	98	
TCMX (SURR)	56%		5			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.
HX = A dilution was required due to complex sample matrix.
CL = The extract was subjected to florisil cleanup by SW846 Method 3620 and sulfur cleanup by SW846 Method 3660 before analysis.
IV = Initial extract is 2.03 grams.

Sample: 1102923 102 Collected: 01/24/19 Analyzed: 02/14/19 - 81.6%Solids Analytes: 8 | Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	25	79	
PCB-1221	ND	ug/Kg	5	57	190	
PCB-1232	ND	ug/Kg	5	32	110	
PCB-1242	ND	ug/Kg	5	21	70	
PCB-1248	ND	ug/Kg	5	16	49	
PCB-1254	ND	ug/Kg	5	38	130	
PCB-1260	ND	ug/Kg	5	31	98	
Total PCBs	ND	ug/Kg	5	31	98	
TCMX (SURR)	62%		5			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.
HX = A dilution was required due to complex sample matrix.
CL = The extract was subjected to florisil cleanup by SW846 Method 3620 and sulfur cleanup by SW846 Method 3660 before analysis.
IV = Initial extract is 2.02 grams.

Sample: 1102925 103 Collected: 01/24/19 Analyzed: 02/14/19 - 82.9%Solids Analytes: 8 | Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	25	79	
PCB-1221	ND	ug/Kg	5	57	190	
PCB-1232	ND	ug/Kg	5	32	110	
PCB-1242	ND	ug/Kg	5	21	70	
PCB-1248	ND	ug/Kg	5	16	49	
PCB-1254	ND	ug/Kg	5	38	130	
PCB-1260	ND	ug/Kg	5	31	98	
Total PCBs	ND	ug/Kg	5	31	98	
TCMX (SURR)	54%		5			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.
HX = A dilution was required due to complex sample matrix.
CL = The extract was subjected to florisil cleanup by SW846 Method 3620 and sulfur cleanup by SW846 Method 3660 before analysis.
FV = Final extract is 2.04 grams.

ANALYTICAL RESULTS: PCBs by GC
Customer: Georgia-Pacific Consumer Products LP **NLS Project: 315265 PO # 1547401**
Project Description: GBB Soil
Project Title: **Template: PCBS** **Printed: 04/25/2019 15:14** **Analyst: CSC**

Sample: 1102927 104 Collected: 01/24/19 Analyzed: 02/14/19 - 70.1%Solids Analytes: 8

Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	25	79	
PCB-1221	ND	ug/Kg	5	57	190	
PCB-1232	ND	ug/Kg	5	32	110	
PCB-1242	ND	ug/Kg	5	21	70	
PCB-1248	ND	ug/Kg	5	16	49	
PCB-1254	ND	ug/Kg	5	38	130	
PCB-1260	ND	ug/Kg	5	31	98	
Total PCBs	ND	ug/Kg	5	31	98	
TCMX (SURR)	68%		5			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.
HX = A dilution was required due to complex sample matrix.
CL = The extract was subjected to florisil cleanup by SW846 Method 3620 and sulfur cleanup by SW846 Method 3660 before analysis.
IV = Initial extract is 2.05 grams.

ANALYTICAL RESULTS: PCBs by GC

Customer: Georgia-Pacific Consumer Products LP **NLS Project: 315831 PO # 01547401**

Project Description: GBB Soil (1)

Project Title: **Template: PCBS** **Printed: 04/26/2019 11:06** **Analyst: CSC**

Sample: 1104367 105 Collected: 02/05/19 Analyzed: 02/27/19 - 81.8%Solids Analytes: 8

Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	25	79	
PCB-1221	ND	ug/Kg	5	57	190	
PCB-1232	ND	ug/Kg	5	32	110	
PCB-1242	ND	ug/Kg	5	21	70	
PCB-1248	ND	ug/Kg	5	16	49	
PCB-1254	ND	ug/Kg	5	38	130	
PCB-1260	ND	ug/Kg	5	31	98	
Total PCBs	ND	ug/Kg	5	31	98	
TCMX (SURR)	50%		5			S

NOTES APPLICABLE TO THIS ANALYSIS:

S = This compound is a surrogate used to evaluate the quality control of a method.
HX = A dilution was required due to complex sample matrix.
CL = The extract was subjected to florisil cleanup by SW846 Method 3620 and sulfur cleanup by SW846 Method 3660 before analysis.
IV = Initial extract is 2.11 grams.

Attachment C

Form 4400-225 Notification for Hazardous Substance Discharge

State of Wisconsin
Department of Natural Resources
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Notification For Hazardous Substance Discharge (Non-Emergency Only)

Form 4400-225 (R 06/17)

Emergency Discharges / Spills should be reported via the 24-Hour Hotline: 1-800-943-0003

Notice: Hazardous substance discharges must be reported immediately according to s. 292.11 Wis. Stats. Non-emergency hazardous substance discharges may be reported by telefaxing or e-mailing a completed report to the Department, or calling or visiting a Department office in person. If you choose to notify the Department by telefax or by email, you should use this form to be sure that all necessary information is included. However, use of this form is not mandatory. Under s. 292.99, Wis. Stats., the penalty for violating the reporting requirements of ch. 292 Wis. Stats., shall be no less than $10 nor more than $5000 for each violation. Each day of continued violation is a separate offense. It is not the Department's intention to use any personally identifiable information from this form for any purpose other than program administration. However, information submitted on this form may also be made available to requesters under Wisconsin's Open Records Law (ss. 19.31 – 19.39, Wis. Stats.).

Confirmatory laboratory data should be included with this form, to assist the DNR in processing this Hazardous Substance Release Notification.

Complete this form. **TYPE or PRINT LEGIBLY.** NOTIFY appropriate DNR region (see next page) **IMMEDIATELY** upon discovery of a potential release from **(check one)**:

- ◯ Underground Petroleum Storage Tank System (additional information may be required for Item 6 below)
- ◯ Aboveground Petroleum Storage Tank System
- ◯ Dry Cleaner Facility
- ◉ Other - Describe: Urban Fill

ATTN DNR: **R & R Program Associate**

Date DNR Notified: 05/09/2019

1. Discharge Reported By

Name	Firm	Phone Number (include area code)
Thomas Kraeutler	Georgia-Pacific Consumer Operations LLC	(920) 438-4969

Mailing Address	Email
1919 South Broadway, Green Bay, WI 54304	thomas.kraeutler@gapac.com

2. Site Information

Name of site at which discharge occurred. Include local name of site/business, not responsible party name, unless a residence/vacant property.

Georgia-Pacific Broadway Mill

Location: Include street address, not PO Box. If no street address, describe as precisely as possible, i.e., 1/4 mile NW of CTHs 60 & 123 on E side of CTH 60.

1919 South Broadway, Green Bay, WI 54304

Municipality: (City, Village, Township) Specify municipality in which the site is located, not mailing address/city.

City of Green Bay

County	Legal Description:	WTM:
Brown	¼ of ¼ Section , Town N, Range ◯ E ◯ W	X Y

3. Responsible Party (RP) and/or RP Representative

Responsible Party Name: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary.

Georgia-Pacific Consumer Operations LLC

☐ A local governmental unit claiming an exemption from state Spill Law and Solid Waste Management responsibilities for the discharge being reported, per Wis. Stat. §§ 292.11(9)(e) and 292.23, should: 1) check this box; 2) review DNR publication RR-055; and 3) provide documentation to DNR that demonstrates compliance with the statutory requirements of the liability exemptions. Local governmental units may also request a fee-based liability clarification letter from DNR by using DNR Form 4400-237.

Contact Person Name (if different)	Phone Number	Email
Thomas Kraeutler	(920) 438-4969	thomas.kraeutler@gapac.com

Mailing Address	City	State	ZIP Code
1919 South Broadway	Green Bay	WI	54304

Responsible Party Name: Business or owner name that is responsible for cleanup. If more than one, list all. Attach additional pages as necessary.

Contact Person Name (if different)	Phone Number	Email

Mailing Address	City	State	ZIP Code

(continued)

4. Hazardous Substance Information

Identify hazardous substance discharged (check all that apply):

- ☐ VOCs
  - ☐ PCE
  - ☐ TCE
  - ☐ Other Chlorinated
  - ☐ Diesel
  - ☐ Fuel Oil
  - ☐ Gasoline
  - ☐ Hydraulic Oil
  - ☐ Jet Fuel
- *(VOCs continued)*
  - ☐ Mineral Oil
  - ☐ Waste Oil
  - ☐ Petroleum-Unknown Type
- ☐ PAHs
- ☒ PCBs
- ☐ Cyanide
- ☐ Leachate
- ☐ Manure
- ☐ Metals
  - ☐ Arsenic
  - ☐ Chromium
  - ☐ Lead
  - ☐ Other: _____
- ☐ Pesticides: _____
- ☐ Fertilizer: _____
- ☐ RCRA Hazardous Waste: _____
- ☐ Other: _____
- ☐ Unknown

5. Impacts to the Environment Information

Enter "K" for known/confirmed or "P" for potential for all that apply.

- ____ Air Contamination
- ____ Co-mingled (Petroleum & Non-Petroleum)
- ____ Contamination in Fractured Bedrock
- ____ Contamination Within 1 Meter of Bedrock
- ____ Contaminated Private Well
- ____ Contaminated Public Well
- ____ Contamination in Right of Way
- ____ Fire Explosion Threat
- ____ Free Product
- ____ Groundwater Contamination
- ____ Off-Site Contamination
- ____ Sanitary Sewer Contamination
- ____ Storm Sewer Contamination
- ____ Sediment Contamination
- P Soil Contamination
- ____ Soil Gas Contamination
- ____ Sub-slab Vapor Contamination
- ____ Surface Water Contamination
- ____ Within 100 ft of Private Well
- ____ Within 1000 ft of Public Well

Other (specify): _____

Contamination was discovered as a result of:

☐ Tank closure assessment Date _____ ☐ Site assessment Date _____ ☒ Other - Describe: Geotechnical Investigation Date 01/24/2019

Lab results: ☐ Lab results will be faxed upon receipt ☒ Lab results are attached

Additional Comments: Include a brief description of immediate actions taken to halt the release and contain or cleanup hazardous substances that have been discharged.
Urban fill, no known source

6. Federal Energy Act Requirements (Section 9002(d) of the Solid Waste Disposal Act (SWDA))

For all confirmed releases from USTs occurring after 9/30/2007 please provide the following information:

☒ Does not apply.

Source

- ☐ Tank
- ☐ Piping
- ☐ Dispenser
- ☐ Submersible Turbine Pump
- ☐ Delivery Problem
- ☐ Other (specify): _____

Cause

- ☐ Spill
- ☐ Overfill
- ☐ Corrosion
- ☐ Physical or Mechanical Damage
- ☐ Installation Problem
- ☐ Other (does not fit any of above)
- ☒ Unknown

Contact information to report non-emergency releases in DNR's five regions are as follows:

Northeast Region (FAX: 920-662-5413); Attention -- R&R Program Associate: DNRRRNER@wisconsin.gov

Brown, Calumet, Door, Fond du Lac **(except City of Waupun - see South Central Region)**, Green Lake, Kewaunee, Manitowoc, Marinette, Marquette, Menominee, Oconto, Outagamie, Shawano, Sheboygan, Waupaca, Waushara, Winnebago counties

Northern Region (FAX: 715-623-6773); Attention -- R&R Program Associate: DNRRRNOR@wisconsin.gov

Ashland, Barron, Bayfield, Burnett, Douglas, Forest, Florence, Iron, Langlade, Lincoln, Oneida, Polk, Price, Rusk, Sawyer, Taylor, Vilas, Washburn counties

South Central Region (FAX: 608-273-5610); Attention -- R&R Program Associate: DNRRRSCR@wisconsin.gov

Columbia, Dane, Dodge, Fond du Lac **(City of Waupun only)**, Grant, Green, Iowa, Jefferson, Lafayette, Richland, Rock, Sauk, Walworth counties

Southeast Region (FAX: 414-263-8550); Attention -- R&R Program Associate: DNRRRSER@wisconsin.gov

Kenosha, Milwaukee, Ozaukee, Racine, Washington, Waukesha counties

West Central Region (FAX: 715-839-6076); Attention -- R&R Program Associate: DNRRRWCR@wisconsin.gov

Adams, Buffalo, Chippewa, Clark, Crawford, Dunn, Eau Claire, Jackson, Juneau, LaCrosse, Marathon, Monroe, Pepin, Pierce, Portage, St. Croix, Trempealeau, Vernon, Wood counties