

Lauridsen, Keld B - DNR

From: Lauridsen, Keld B - DNR
Sent: Wednesday, August 14, 2019 2:17 PM
To: 'Maletzke, Jeff'
Cc: Cole, Albert; Mrotek, Melissa (GBY); Romback-Bartels, Jean - DNR; Chronert, Roxanne N - DNR
Subject: GP Broadway Mill Expansion - BRRTS # pending

Jeff,

I have reviewed the available soil data for the above site and concur with your general approach collecting additional soil samples to further delineate the remaining PCB contamination in soil.

I discussed the proposed soil sampling locations with Melissa earlier today over the phone and I suggested to potentially move them counter clockwise in order to get a better handle on degree and extent prior to excavation of the contaminated soil. I also suggested to consider collecting additional soil samples (to be held by the lab) even further out in case PCBs are still present in any of the first set of soil samples. Hopefully, the proposed soil sampling will eliminate the need for post-excavation confirmation soil sampling.

Due to PCB contamination being confirmed at this site, a Responsible Party letter will be issued to Georgia Pacific shortly.

Let me know if we need to discuss anything further.

Thanks,

-Keld

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

From: Maletzke, Jeff <Jeff.Maletzke@aecom.com>
Sent: Friday, August 9, 2019 1:04 PM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Cc: Cole, Albert <Albert.Cole@aecom.com>; Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Subject: GP Project Pace work plan

Keld:

Welcome back. On behalf of Georgia Pacific please see attached a summary of our findings from the initial confirmation sampling as well as a work plan for proposed additional sampling. We look forward to discussing the findings and the proposed sampling with you soon. Thank you.

Jeff Maletzke, PG (WI)
Senior Hydrogeologist, Remediation

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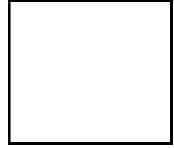
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(920) 435-8821
[www_gp.com](http://www_gp_com)

August 8, 2019

SUBMITTED VIA EMAIL

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

Subject: Confirmation Sampling Results and Continuing Investigation 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 additional 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 summary of findings based on confirmation sampling completed on June 17, 2019, as well as a brief work plan for a continuing site investigation to further delineate the horizontal extent of PCB impacts near B-101. Data obtained as part of this proposed continuing site investigation will be used in support of a request for No Further Action (NFA).

Confirmation Sampling

As proposed in the Work Plan submitted to the Department on May 9, 2019, a Direct Push Technology (DPT) rig was used to collect two soil samples directly adjacent to four previously completed geotechnical borings, as well as six additional samples at three different points around each original Geotech boring. Boring logs for the previously completed geotechnical borings are included as Attachment A. These logs correspond with the "D" sample locations shown on Figure 1. More detailed descriptions of sample collection at each location are provided below.

- **B-101:** Unsaturated soil samples were collected directly adjacent to the original geotechnical boring location ("D") at 3 to 4 feet below ground surface (ft. bgs), and then in native clay at a depth of 8.5 to 9.5 ft. bgs. A duplicate sample was also collected at location 101D at the 3- to 4-foot interval. Two additional samples were collected at the same depths from each of three locations ("A", "B", and "C") 15 feet from boring 101D. All samples were submitted for laboratory analysis of PCBs.
- **B-103:** Unsaturated soil (non-coal) samples were collected directly adjacent to the original geotechnical boring ("D") at 5.5 to 6.5 ft. bgs and 7.0 to 8.0 ft. bgs within fill and submitted for laboratory analysis of Benzene. A duplicate sample was also collected at location 103D at the 5.5- to 6.5-foot interval. Two additional samples were collected at the same depths from each of three locations ("A", "B", and "C") 15 feet from boring 103D and held for later analysis of Benzene. Based

on the results of samples collected at 103D, these six additional held samples were not analyzed for benzene.

- **B-104A:** A saturated soil (non-coal) sample was collected directly adjacent to the original geotechnical boring ("D") at 4.8 to 5.8 ft. bgs within fill and submitted for laboratory analysis of Benzene. Additional samples were collected from each of three locations ("A", "B", and "C") as described above for B-103. Based on the results of samples collected at 104D, these three additional held samples were not analyzed for benzene.
- **B-105:** A saturated soil (non-coal) sample was collected directly adjacent to the original geotechnical boring ("D") at 5 to 6 ft. bgs within fill and submitted for laboratory analysis of benzene and cadmium. Additional samples were collected from each of three locations ("A", "B", and "C") as described above for B-103. A duplicate sample for benzene was collected at location 105A and a duplicate sample for cadmium was collected at location 105D. Based on the results of samples collected at 105D, the three additional held samples were not analyzed for benzene. However, each of these three samples were analyzed for cadmium.

All laboratory samples were collected in sample containers provided by Northern Lakes Services located in Crandon, Wisconsin. The samples were placed immediately on ice after collection. The samples were kept and shipped on ice and trip blanks were used.

Sampling Results

Table 1 provides a summary of the analytical data and the regulatory standards. A summary of detected compounds is also shown on Figure 1. The analytical reports are enclosed as Attachment B.

Benzene and Cadmium

The results of the confirmation sampling indicate no detections of benzene and very low levels of cadmium. The detected concentrations of cadmium are below the NR720 RCLs. These results indicate no need for further investigation with regard to benzene and cadmium.

PCBs

Total PCBs were detected in soil samples from 3 to 4 ft bgs at B-101B, C, and D at concentrations ranging between 55 and 270 ug/Kg. Each of the detected concentrations are below the Industrial Direct Contact RCL of 967 ug/Kg, however all exceed the Groundwater Pathway RCL of 9.4 ug/Kg. The occurrence of PCBs near B-101 is limited to surficial fill above coal and/or native clay as no PCBs were detected in deeper samples (8.5 to 9.5 ft bgs) collected within the native clay. Thus, the vertical extent of PCBs has been defined in this area. In addition, the lack of PCBs in B-101A has established the lateral extent to the north.

Continuing Investigation Sampling Plan

There is no known source for the low-level PCB detections, and they are attributed to an anomaly contained in the surficial urban fill. As discussed above, the occurrence of PCBs near B-101 is limited to the surficial fill above coal and/or native clay. An examination of several additional geotechnical borings completed in this area (i.e. B-102, B-201, B-204, B-208A, and B-233) indicates that this surficial fill ranges in thickness between approximately 4 and 7 feet. These boring logs are included as Attachment C.

Therefore, acknowledging the distribution of the surficial fill in the vicinity of B-101, and based on the detections of PCBs in the initial confirmation sampling, additional soil samples will be collected to further delineate the extent of PCBs (relative to the Groundwater Pathway RCL). Ultimately the delineated extent will be used to define the potential limits of excavation/soil removal and disposal in support of an NFA request. Direct push technology will be utilized to collect a soil (non-coal) sample at locations "E through H" at a depth of 3 to 4 ft bgs. Sample B-101E will be located approximately 20 feet from B-101D; B-101G will be located approximately 20 feet from B-101B; B-101F will be located on the arc between B-101E and B-101G; and B-101H will be located approximately 15 feet from B-101C. Samples will be collected at each location and submitted for laboratory analysis of total PCBs and PCB isomers consistent with the initial confirmation sampling completed on June 17, 2019.

Please contact me at (920) 438-2233 or melissa.mrotek@gapac.com if you have any questions.

Sincerely,



Melissa Mrotek
Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Broadway Mill

Enclosures: Figure 1 – Confirmation Sampling Locations
 Table 1 - Summary of Analytical Results
 Attachment A - Boring Logs B-101, B-103, B-104A, B-105
 Attachment B - Analytical Report from Northern Lake Service, Inc.
 Attachment C – Boring Logs B-102, B-201, B-204, B-208A, and B-233

B-101 AREA



Confirmation Sampling Locations

- A (Approximately 15 feet from initial Geotechnical Boring)
- B (Approximately 15 feet from initial Geotechnical Boring)
- C (Approximately 15 feet from initial Geotechnical Boring)
- D (Confirmation sample location coincident with geotechnical boring completed January 2019)
- ◆ Location of Geotechnical Soil Borings
- ◆ Proposed additional confirmation sampling location at 3-4 ft bgs

ND = Not Detected
J = Result is between Limit of Detection and Limit of Quantification
NA = Not Analyzed per Release Confirmation Sampling Plan submitted to WDNR May 9, 2019 and WDNR recommendation via email May 10, 2019.

0 200 400
Feet

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PROJECT:	Pace PM02			
MACH NAME:	Balance of Plant			
DET NAME:	CONFIRMATION SAMPLE LOCATIONS			
DR.	MTP	CH.	JM	DATE: 7/2/19 - - -
-	-	AECOM #:	2.01	JOB #: 0022976
-	-	-	-	REV
CONFIRMATION SAMPLE LOCATIONS				DWG #: FIGURE 1

Soil Analytical Data Summary - June 2019
Project Pace Mill Expansion
Georgia Pacific Broadway Mill - Green Bay, Wisconsin
Project No. 60594990

Parameter	Unit	Sample	B-101A	B-101A	B-101B	B-101B	B-101C	B-101C	B-101D	B-101D DUP	B-101D	B-103A	B-103A	B-103B	B-103B	B-103C	B-103C
		Depth (ft/bgs)	3-4	8.5-9.5	3-4	8.5-9.5	3-4	8.5-9.5	3-4	8.5-9.5	5.5-6.5	7-8	5.5-6.5	7-8	5.5-6.5	7-8	
Cadmium, Total	mg/kg																
PCB-1016	ug/Kg		ND	ND	ND	ND	ND	ND	ND	ND							
PCB-1221	ug/Kg		ND	ND	ND	ND	ND	ND	ND	ND							
PCB-1232	ug/Kg		ND	ND	ND	ND	ND	ND	ND	ND							
PCB-1242	ug/Kg		ND	ND	[55]J	ND	250	ND	ND	94	ND						
PCB-1248	ug/Kg		ND	ND	ND	ND	ND	ND	ND	ND	ND						
PCB-1254	ug/Kg		ND	ND	ND	ND	ND	ND	ND	ND	ND						
PCB-1260	ug/Kg		ND	ND	ND	ND	[19]J	ND	ND	ND	ND						
Total PCBs	ug/Kg		ND	ND	[55]J	ND	270	ND	ND	94	ND						
Benzene	ug/Kg																

Notes:

1. 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."
2. Only parameters with detections are shown.
3. DF = Dilution Factor

= Not Analyzed per Release Confirmation Sampling Plan submitted to WDNR May 9, 2019 and WDNR recommendation in e-mail correspondence dated May 10, 2019.

ND = Not Detected

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

-- = No RCL listed

Soil Analytical Data Summary - June 2019
Project Pace Mill Expansion
Georgia Pacific Broadway Mill - Green Bay, Wisconsin
Project No. 60594990

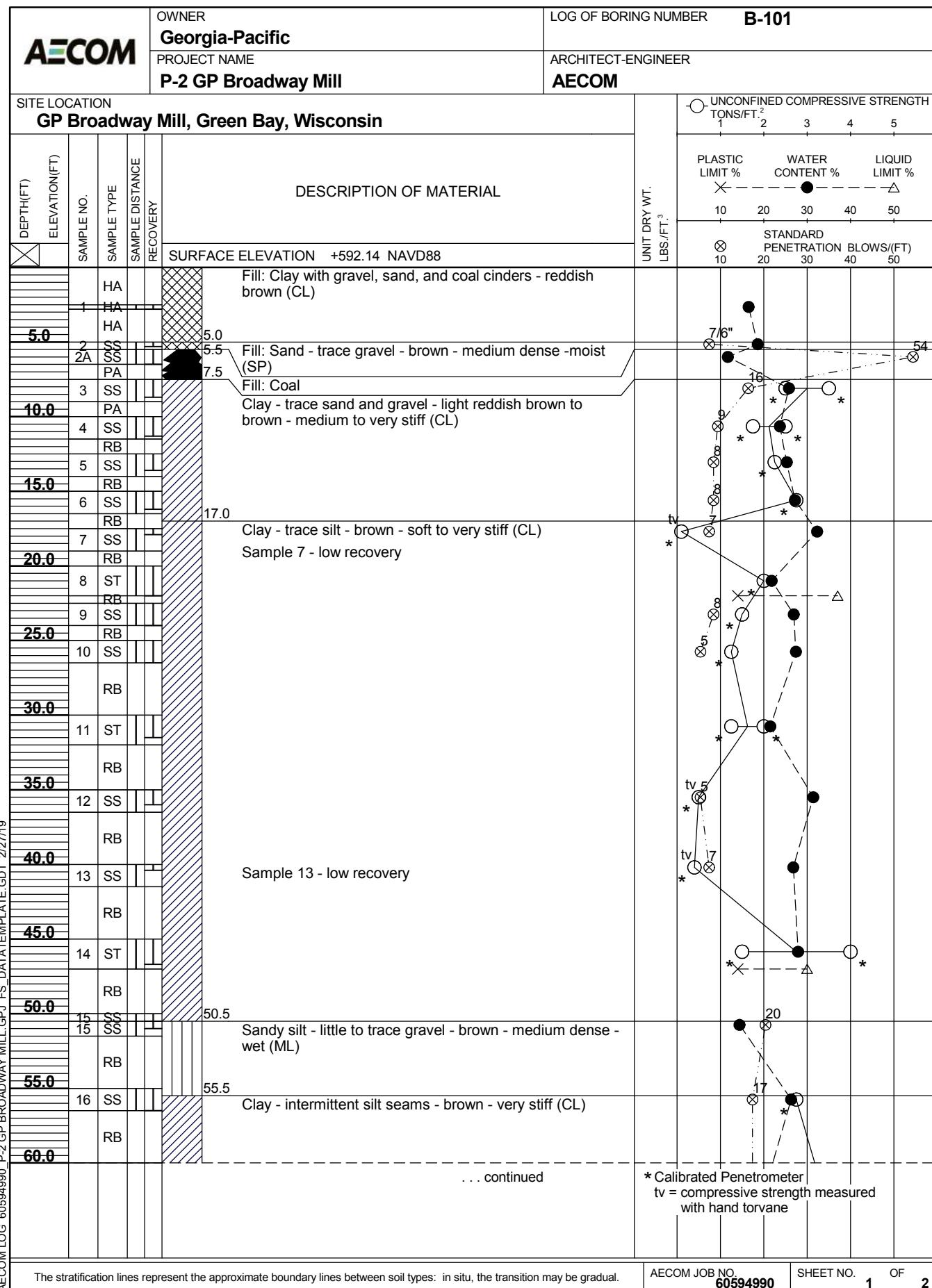
Parameter	Unit	Sample	B-103D	B-103D DUP	B-103D	B-104A	B-104B	B-104C	B-104D	B-105A	B-105B	B-105C	B-105D	B-105D DUP
		Depth (ft/bgs)	5.5-6.5	5.5-6.5	7-8	4.8-5.8	4.8-5.8	4.8-5.8	4.8-5.8	5-6	5-6	5-6	5-6	5-6
Cadmium, Total	mg/kg									[0.059]	[0.089]	ND	[0.095]	ND
PCB-1016	ug/Kg													
PCB-1221	ug/Kg													
PCB-1232	ug/Kg													
PCB-1242	ug/Kg													
PCB-1248	ug/Kg													
PCB-1254	ug/Kg													
PCB-1260	ug/Kg													
Total PCBs	ug/Kg													
Benzene	ug/Kg		ND	ND	ND				ND				ND	

Soil Analytical Data Summary - June 2019
Project Pace Mill Expansion
Georgia Pacific Broadway Mill - Green Bay, Wisconsin
Project No. 60594990

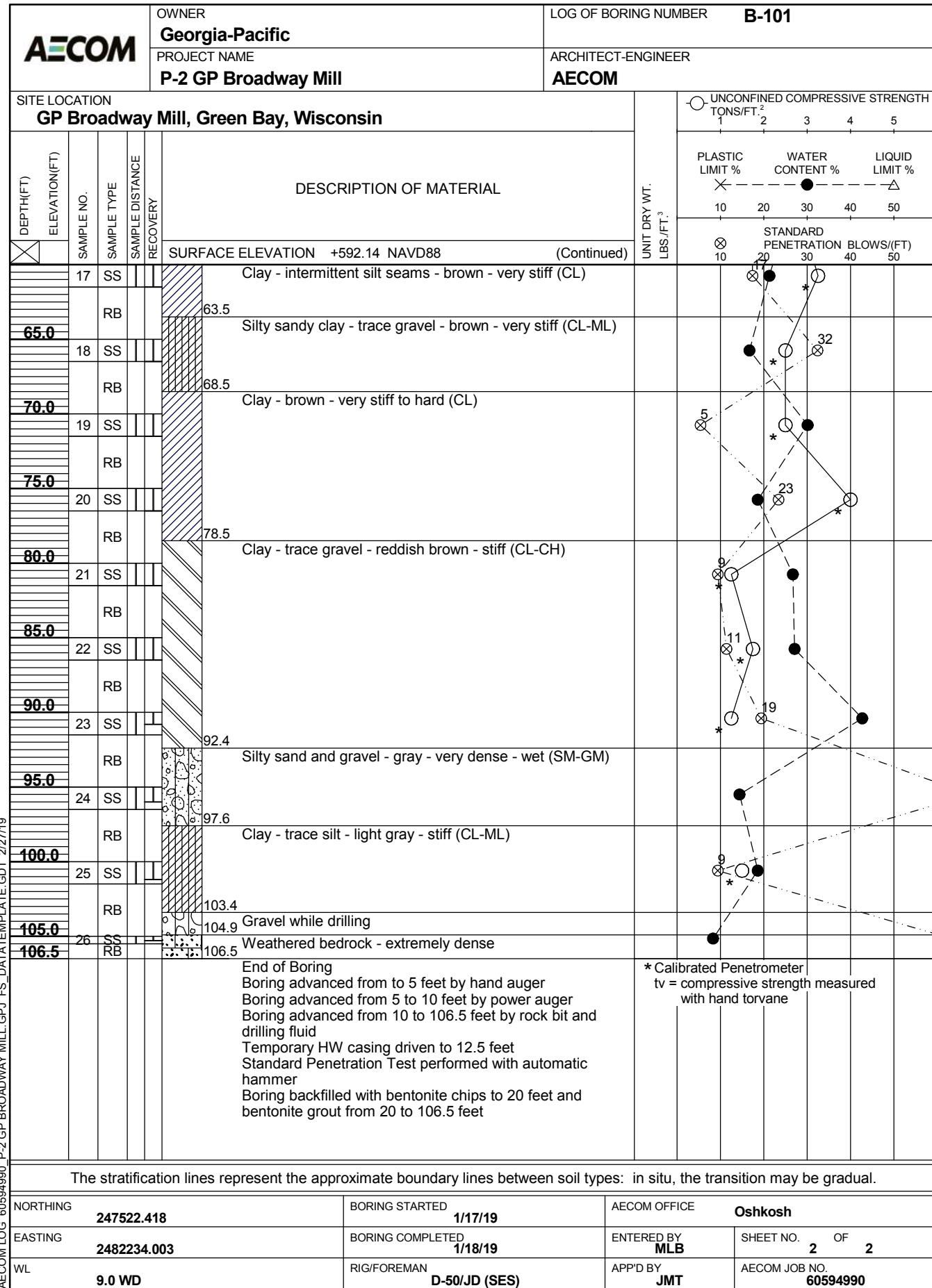
Parameter	Unit	Sample Depth (ft/bgs)	Residual Soil Contaminant Levels (ch NR 720 Wis. Adm Code)		
			Industrial Direct Contact	Non-Industrial Direct Contact	Protection of Groundwater Quality (DF = 2)
Cadmium, Total	mg/kg		985	71.1	0.752
PCB-1016	ug/Kg		28,000	4,110	--
PCB-1221	ug/Kg		883	213	--
PCB-1232	ug/Kg		792	190	--
PCB-1242	ug/Kg		972	235	--
PCB-1248	ug/Kg		975	236	--
PCB-1254	ug/Kg		988	239	--
PCB-1260	ug/Kg		1,000	243	--
Total PCBs	ug/Kg		967	234	9.4
Benzene	ug/Kg		7,070	1,600	5.1

Attachment A

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



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	PLASTIC LIMIT %	WATER CONTENT %	Liquid Limit %					
SURFACE ELEVATION +586.75 NAVD88										10	20	30	40	50
1	HA			Coal										
2	SS			Fill: Silty clay - trace coal - light brown to reddish brown - very stiff (CL-ML)										
3	SS			Fill: Clay with gravel and wood - brown - stiff (CL)										
4	SS			Wood in sample 4										
5	SS			Fill: Clay with wood - brown - stiff to medium (CH-CL)										
6	SS													
7	SS			Organic sandy silt - trace shells and gravel - brown to black - soft (ML-OL)										
8	SS													
9	SS			Slightly organic clay - gray to brownish gray - stiff (CL-OL)										
10	SS													
11	SS			Sandy silty clay - grayish brown to brown - stiff (CL)										
12	SS													
13	SS			Clay - reddish brown - hard (CL)										
14	SS													
15	ST			sandy silt - brown - dense - wet (ML)										
16	SS													
17	SS			Clay - trace sand - dark reddish brown - stiff (CL)										
18	SS													
19	SS			Clay - grayish brown to reddish brown - stiff to very stiff (CL)										
20	SS													
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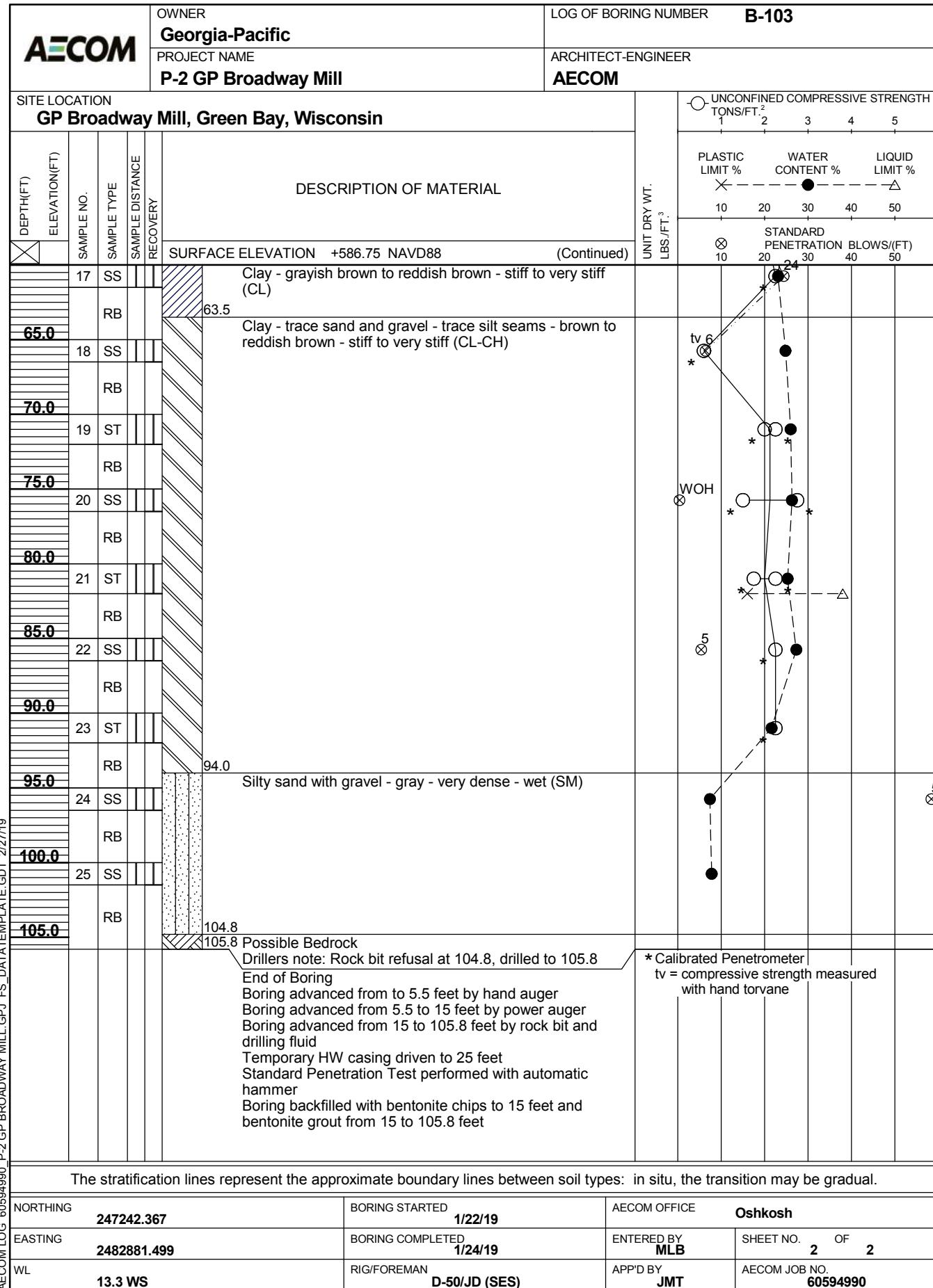
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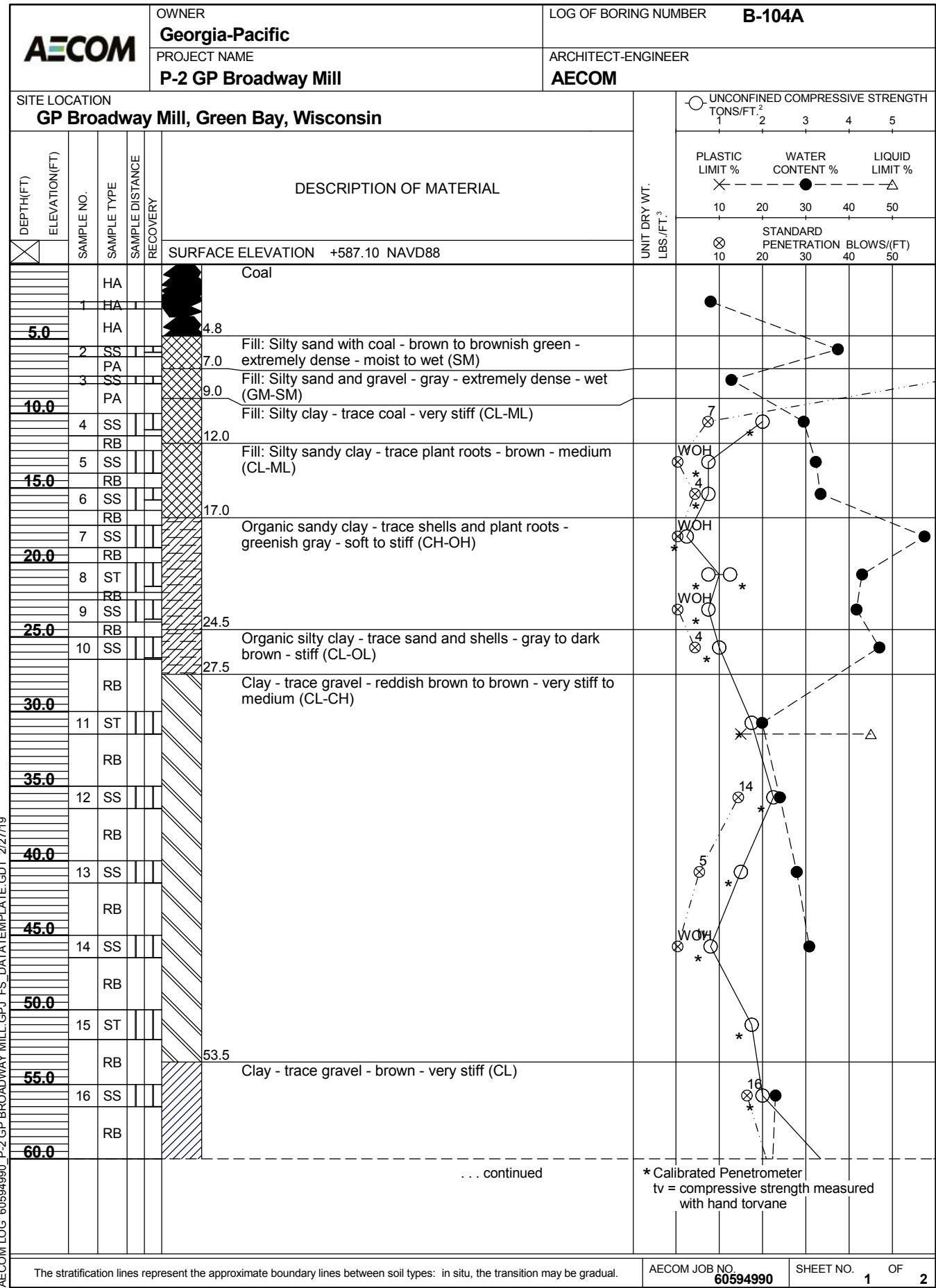
* Calibrated Penetrometer
tv = compressive strength measured with hand torvane

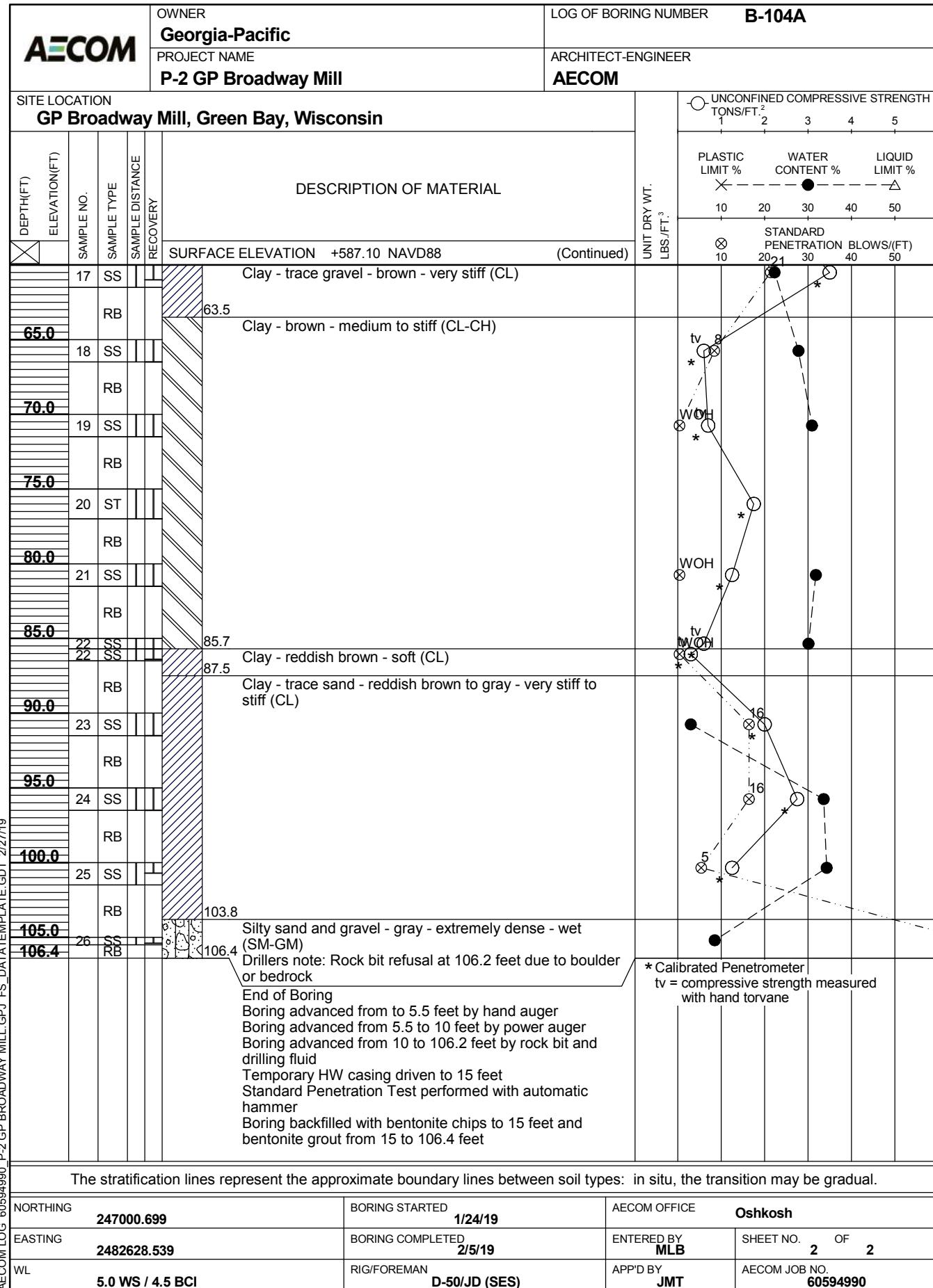
The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

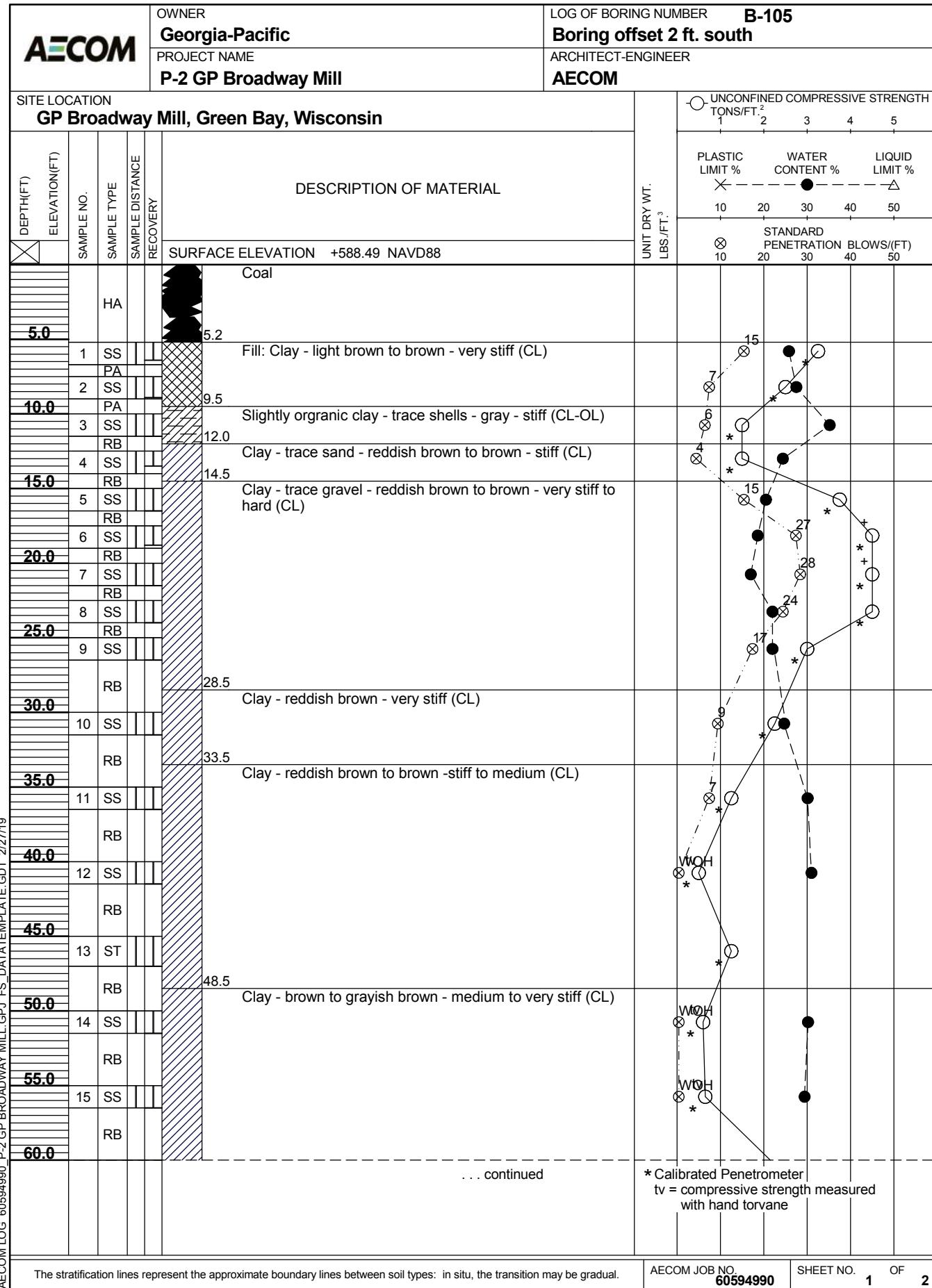
AECOM LOG 60594990 P-2 GP BROADWAY MILL GR-1 FS-DATA-1.MP4 2/27/19

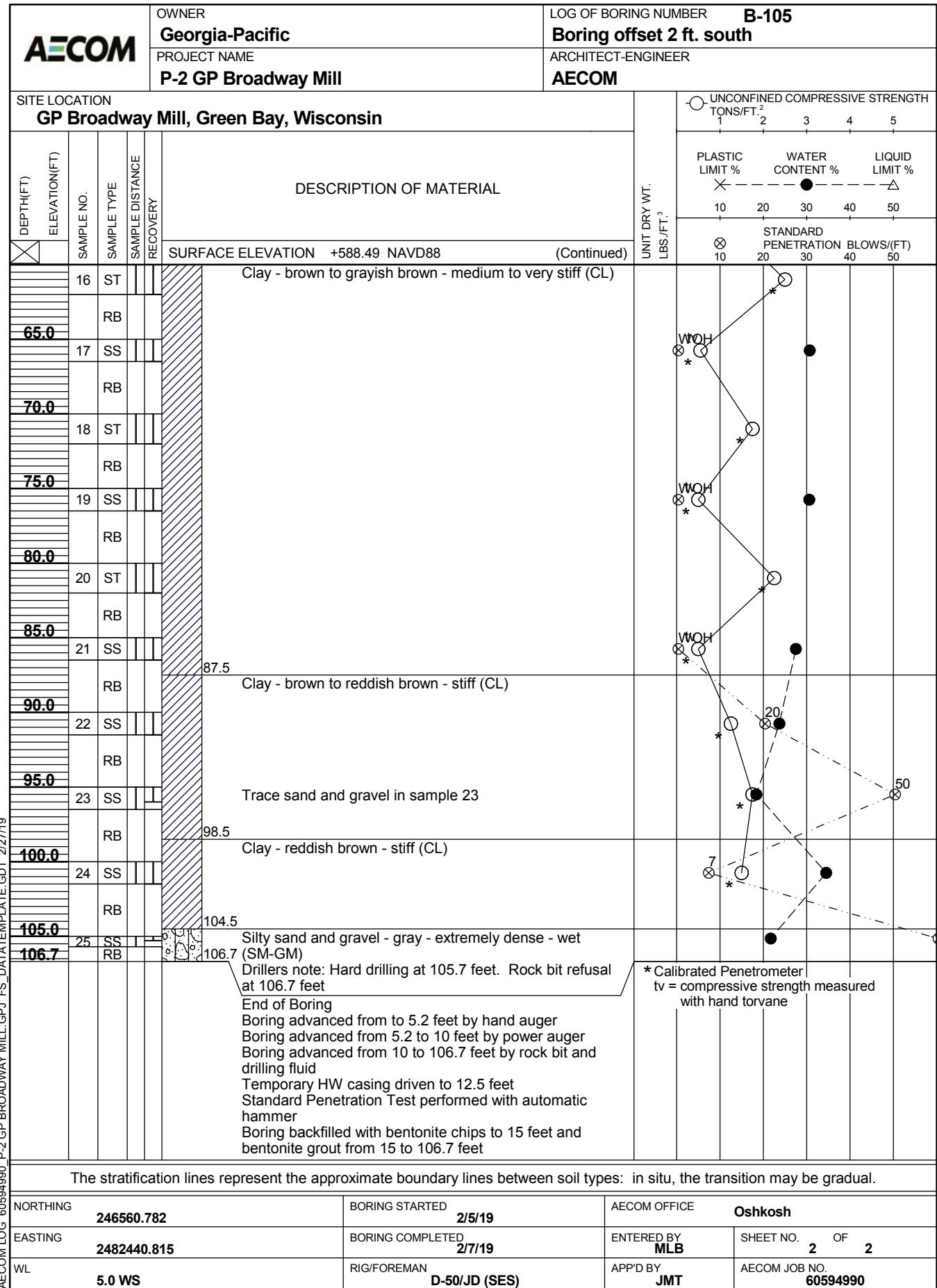
AE COM LOC 60594990 P-2 GP BROADWAY MILL.GPJ FS DATA TEMPLATE.GDT 2/27/19











Attachment B

Analytical Report from Northern Lake Service, Inc.

ANALYTICAL RESULTS: PVOC (soil) by WI (95) GRO

Page 1 of 1

Customer: AECOM (GB) NLS Project: 324080**Project Description: Soil****Project Title:****Template: PVOCS Printed: 07/17/2019 08:26**

Sample: 1129034 B-103D 5.5-6.5 Collected: 06/17/19 Analyzed: 06/27/19 - 82.5%Solids Analytes: 1

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
Benzene	ND	ug/Kg	1	24	80	
1,2,3-Trichlorobenzene (SURR)	105%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

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

Sample: 1129035 B-103D 5.5-6.5 Dup Collected: 06/17/19 Analyzed: 06/27/19 - 81.2%Solids Analytes: 1

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
Benzene	ND	ug/Kg	1	24	80	
1,2,3-Trichlorobenzene (SURR)	102%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

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

Sample: 1129036 B-103D 7-8 Collected: 06/17/19 Analyzed: 06/27/19 - 74.4%Solids Analytes: 1

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
Benzene	ND	ug/Kg	1	24	80	
1,2,3-Trichlorobenzene (SURR)	110%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

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

Sample: 1129037 B-104D 4.8-5.8 Collected: 06/17/19 Analyzed: 06/27/19 - 66.7%Solids Analytes: 1

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
Benzene	ND	ug/Kg	1	24	80	
1,2,3-Trichlorobenzene (SURR)	100%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

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

Sample: 1129038 B-105D 5-6 Collected: 06/17/19 Analyzed: 06/27/19 - 81.3%Solids Analytes: 1

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
Benzene	ND	ug/Kg	1	24	80	
1,2,3-Trichlorobenzene (SURR)	96%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

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

Sample: 1129040 Trip Blank Collected: 06/17/19 Analyzed: 06/27/19 - Analytes: 1

ANALYTE NAME	RESULT	UNITS WWB	DIL	LOD	LOQ	Note
Benzene	ND	ug/Kg	1	24	80	
1,2,3-Trichlorobenzene (SURR)	96%		1			S

NOTES APPLICABLE TO THIS ANALYSIS:

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

ANALYTICAL RESULTS: PCBs by GC

Page 1 of 4

Customer: AECOM (GB) NLS Project: 324080**Project Description: Soil****Project Title:****Template: PCBS Printed: 07/17/2019 08:26**

Sample: 1129031 B-101D 3'-4' Dupe Collected: 06/17/19 Analyzed: 07/08/19 - 83%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	94	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	94	ug/Kg	5	20	67	
TCMX (SURR)	76%		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 before analysis.

IV = Initial extract is 2.01 grams.

Sample: 1129032 B-101D 3'-4' Collected: 06/17/19 Analyzed: 07/08/19 - 80.6%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	ND	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	ND	ug/Kg	5	20	67	
TCMX (SURR)	88%		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 before analysis.

IV = Initial extract is 2.08 grams.

Sample: 1129033 B-101D 8.5-9.5 Collected: 06/17/19 Analyzed: 07/08/19 - 82.7%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	ND	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	ND	ug/Kg	5	20	67	
TCMX (SURR)	77%		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 before analysis.

IV = Initial extract is 2.06 grams.

ANALYTICAL RESULTS: PCBs by GC

Page 2 of 4

Customer: AECOM (GB) NLS Project: 324080**Project Description: Soil****Project Title:****Template: PCBS Printed: 07/17/2019 08:26**

Sample: 1129050 B-101A 3-4 Collected: 06/17/19 Analyzed: 07/08/19 - 81.4%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	ND	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	ND	ug/Kg	5	20	67	
TCMX (SURR)	85%		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 before analysis.

IV = Initial extract is 2.1 grams.

Sample: 1129051 B-101A 8.5-9.5 Collected: 06/17/19 Analyzed: 07/08/19 - 82.1%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	ND	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	ND	ug/Kg	5	20	67	
TCMX (SURR)	83%		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 before analysis.

IV = Initial extract is 2.12 grams.

ANALYTICAL RESULTS: PCBs by GC

Page 3 of 4

Customer: AECOM (GB) NLS Project: 324080**Project Description: Soil****Project Title:****Template: PCBS Printed: 07/17/2019 08:26**

Sample: 1129052 B-101B 3'-4' Collected: 06/17/19 Analyzed: 07/08/19 - 79.8%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	[55]	ug/Kg	5	19	63	J
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	[55]	ug/Kg	5	20	67	J
TCMX (SURR)	77%		5			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.

HX = A dilution was required due to complex sample matrix.

CL = The extract was subjected to florisil cleanup by SW846 Method 3620 before analysis.

IV = Initial extract is 2.06 grams.

Sample: 1129053 B-101B 8.5-9.5 Collected: 06/17/19 Analyzed: 07/08/19 - 82.7%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	ND	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	ND	ug/Kg	5	20	67	
TCMX (SURR)	85%		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 before analysis.

IV = Initial extract is 2.1 grams.

ANALYTICAL RESULTS: PCBs by GC

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Customer: AECOM (GB) NLS Project: 324080**Project Description: Soil****Project Title:****Template: PCBS Printed: 07/17/2019 08:26**

Sample: 1129054 B-101C 3'-4' Collected: 06/17/19 Analyzed: 07/08/19 - 82.3%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	250	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	[19]	ug/Kg	5	19	63	J
Total PCBs	270	ug/Kg	5	20	67	
TCMX (SURR)	75%		5			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.

HX = A dilution was required due to complex sample matrix.

CL = The extract was subjected to florisil cleanup by SW846 Method 3620 before analysis.

IV = Initial extract is 2.06 grams.

Sample: 1129055 B-101C 8.5-9.5 Collected: 06/17/19 Analyzed: 07/08/19 - 77.9%Solids Analytes: 8 Notes: HX

ANALYTE NAME	RESULT	UNITS DWB	DIL	LOD	LOQ	Note
PCB-1016	ND	ug/Kg	5	20	67	
PCB-1221	ND	ug/Kg	5	42	140	
PCB-1232	ND	ug/Kg	5	21	69	
PCB-1242	ND	ug/Kg	5	19	63	
PCB-1248	ND	ug/Kg	5	9.5	32	
PCB-1254	ND	ug/Kg	5	15	49	
PCB-1260	ND	ug/Kg	5	19	63	
Total PCBs	ND	ug/Kg	5	20	67	
TCMX (SURR)	72%		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 before analysis.

IV = Initial extract is 2.13 grams.

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ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. WI00034
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NLS Project: 324080
NLS Customer: 50040
Fax: 920 468 3312 Phone: 800 949 1978

Project: Soil

B-101D 3'-4' Dupe NLS ID: 1129031

COC: 211172:1 Matrix: SO

Collected: 06/17/19 09:40 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	83.0	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-101D 3'-4' NLS ID: 1129032

COC: 211172:2 Matrix: SO

Collected: 06/17/19 09:40 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	80.6	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-101D 8.5-9.5 NLS ID: 1129033

COC: 211172:3 Matrix: SO

Collected: 06/17/19 10:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	82.7	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-103D 5.5-6.5 NLS ID: 1129034

COC: 211172:4 Matrix: SO

Collected: 06/17/19 13:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	82.5	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PVOCs (soil) by WI(95)GRO Sept 95 (MeOH)	see attached					06/27/19	WI(95)GRO Sept 95	721026460

B-103D 5.5-6.5 Dup NLS ID: 1129035

COC: 211172:5 Matrix: SO

Collected: 06/17/19 13:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	82.5	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PVOCs (soil) by WI(95)GRO Sept 95 (MeOH)	see attached					06/27/19	WI(95)GRO Sept 95	721026460

B-103D 7-8 NLS ID: 1129036

COC: 211172:6 Matrix: SO

Collected: 06/17/19 13:10 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	81.2	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PVOCs (soil) by WI(95)GRO Sept 95 (MeOH)	see attached					06/27/19	WI(95)GRO Sept 95	721026460

B-104D 4.8-5.8 NLS ID: 1129037

COC: 211172:7 Matrix: SO

Collected: 06/17/19 15:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	74.4	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PVOCs (soil) by WI(95)GRO Sept 95 (MeOH)	see attached					06/27/19	WI(95)GRO Sept 95	721026460

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ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. WI00034
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NLS Project: 324080
NLS Customer: 50040
Fax: 920 468 3312 Phone: 800 949 1978

Client: AECOM (GB)
Attn: Jeffrey Maletzke, PG
2985 South Ridge Road, Suite B
Green Bay, WI 54304

Project: Soil

B-105D 5-6 NLS ID: 1129038

COC: 211172:8 Matrix: SO

Collected: 06/17/19 16:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Cadmium, tot. recoverable as Cd by ICP	[0.095]	mg/Kg DWB	5	0.048	0.15	06/26/19	SW846 6010	721026460
Solids, total on solids	81.3	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
Metals digestion - tot. recov (solid) ICP	yes					06/25/19	SW846 3050M	721026460
PVOCs (soil) by WI(95)GRO Sept 95 (MeOH)	see attached					06/27/19	WI(95)GRO Sept 95	721026460

B-105D 5-6 Dup NLS ID: 1129039

COC: 211172:9 Matrix: SO

Collected: 06/17/19 16:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Cadmium, tot. recoverable as Cd by ICP	ND	mg/Kg DWB	5	0.054	0.17	06/26/19	SW846 6010	721026460
Solids, total on solids	83.1	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
Metals digestion - tot. recov (solid) ICP	yes					06/25/19	SW846 3050M	721026460

Trip Blank NLS ID: 1129040

COC: 211172:10 Matrix: TB

Collected: 06/17/19 00:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
PVOCs (soil) by WI(95)GRO Sept 95 (MeOH)	see attached					06/27/19	WI(95)GRO Sept 95	721026460

B-105A 5-6 Dup NLS ID: 1129041

COC: 211173:3 Matrix: SO

Collected: 06/17/19 16:45 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	81.9	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-103A 5.5-6.5 NLS ID: 1129042

COC: 211173:4 Matrix: SO

Collected: 06/17/19 14:35 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	79.1	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-103A 7-8 NLS ID: 1129043

COC: 211173:5 Matrix: SO

Collected: 06/17/19 14:45 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	77.1	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-104C 4.8-5.8 NLS ID: 1129044

COC: 211173:6 Matrix: SO

Collected: 06/17/19 15:10 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	78.8	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-104B 4.8-5.8 NLS ID: 1129045

COC: 211173:7 Matrix: SO

Collected: 06/17/19 15:20 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	65.5	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

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ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
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NLS Project: 324080
NLS Customer: 50040
Fax: 920 468 3312 Phone: 800 949 1978

Project: Soil

B-104A 4.8-5.8 NLS ID: 1129046

COC: 211173:8 Matrix: SO

Collected: 06/17/19 15:40 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	59.3	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-105C 5-6 NLS ID: 1129047

COC: 211173:9 Matrix: SO

Collected: 06/17/19 16:15 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Cadmium, tot. recoverable as Cd by ICP	ND	mg/Kg DWB	5	0.043	0.14	06/26/19	SW846 6010	721026460
Solids, total on solids	80.9	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
Metals digestion - tot. recov (solid) ICP	yes					06/25/19	SW846 3050M	721026460

B-105B 5-6 NLS ID: 1129048

COC: 211173:10 Matrix: SO

Collected: 06/17/19 16:30 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Cadmium, tot. recoverable as Cd by ICP	[0.089]	mg/Kg DWB	5	0.030	0.097	06/26/19	SW846 6010	721026460
Solids, total on solids	82.8	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
Metals digestion - tot. recov (solid) ICP	yes					06/25/19	SW846 3050M	721026460

B-105A 5-6 NLS ID: 1129049

COC: 211173:11 Matrix: SO

Collected: 06/17/19 16:45 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Cadmium, tot. recoverable as Cd by ICP	[0.059]	mg/Kg DWB	5	0.049	0.16	06/26/19	SW846 6010	721026460
Solids, total on solids	80.6	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
Metals digestion - tot. recov (solid) ICP	yes					06/25/19	SW846 3050M	721026460

B-101A 3-4 NLS ID: 1129050

COC: 211174:1 Matrix: SO

Collected: 06/17/19 11:30 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	81.4	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-101A 8.5-9.5 NLS ID: 1129051

COC: 211174:2 Matrix: SO

Collected: 06/17/19 11:40 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	82.1	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-101B 3'-4' NLS ID: 1129052

COC: 211174:3 Matrix: SO

Collected: 06/17/19 11:00 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	79.8	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

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ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
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NLS Project: 324080
NLS Customer: 50040
Fax: 920 468 3312 Phone: 800 949 1978

Project: Soil

B-101B 8.5-9.5 NLS ID: 1129053

COC: 211174:4 Matrix: SO

Collected: 06/17/19 11:10 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	82.7	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-101C 3'-4' NLS ID: 1129054

COC: 211174:5 Matrix: SO

Collected: 06/17/19 10:25 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	82.3	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-101C 8.5-9.5 NLS ID: 1129055

COC: 211174:6 Matrix: SO

Collected: 06/17/19 10:35 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	77.9	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460
PCBs (solid) by SW846 8082	see attached					07/08/19	SW846 8082	721026460
Organics Extraction (Soil) for PCBs	yes					06/26/19	SW846 3550C	721026460

B-103C 5.5-6.5 NLS ID: 1129056

COC: 211174:7 Matrix: SO

Collected: 06/17/19 13:45 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	85.0	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-103C 7-8 NLS ID: 1129057

COC: 211174:8 Matrix: SO

Collected: 06/17/19 13:55 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	78.4	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-103B 5.5-6.5 NLS ID: 1129058

COC: 211174:9 Matrix: SO

Collected: 06/17/19 14:10 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	78.8	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

B-103B 7-8 NLS ID: 1129059

COC: 211174:10 Matrix: SO

Collected: 06/17/19 14:20 Received: 06/19/19

Parameter	Result	Units	Dilution	LOD	LOQ	Analyzed	Method	Lab
Solids, total on solids	76.6	%	1	0.10*		06/19/19	SM 2540-G 20ed	721026460

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ANALYTICAL REPORT

WDNR Laboratory ID No. 721026460
WDATCP Laboratory Certification No. 105-330
EPA Laboratory ID No. WI00034
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NLS Project: 324080
NLS Customer: 50040
Fax: 920 468 3312 Phone: 800 949 1978

Client: AECOM (GB)
Attn: Jeffrey Maletzke, PG
2985 South Ridge Road, Suite B
Green Bay, WI 54304

Project: Soil

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


Attachment C

Boring Logs B-102, B-201, B-204, B-208A, and B-233



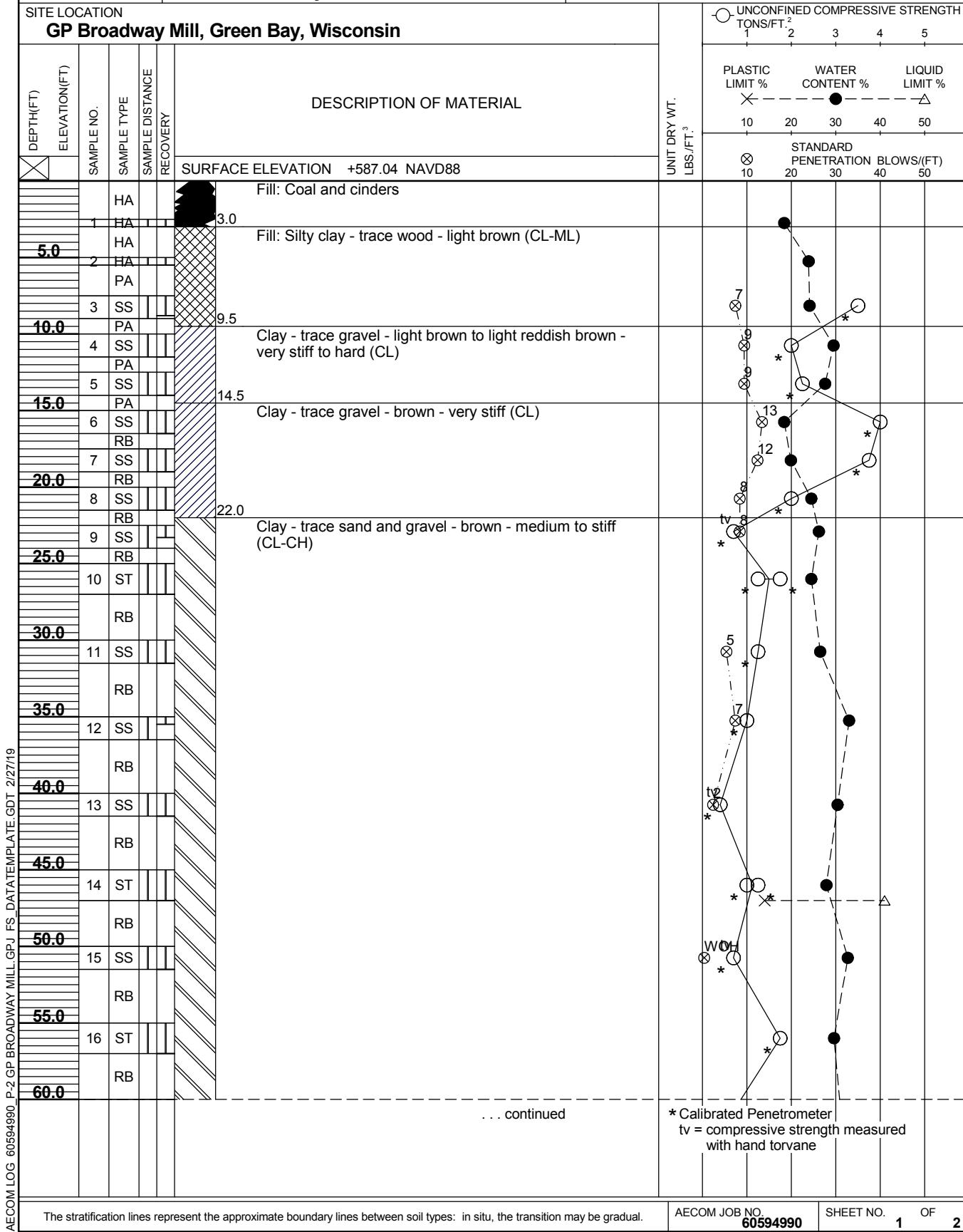
OWNER
Georgia-Pacific
PROJECT NAME
P-2 GP Broadway Mill

LOG OF BORING NUMBER **B-102**

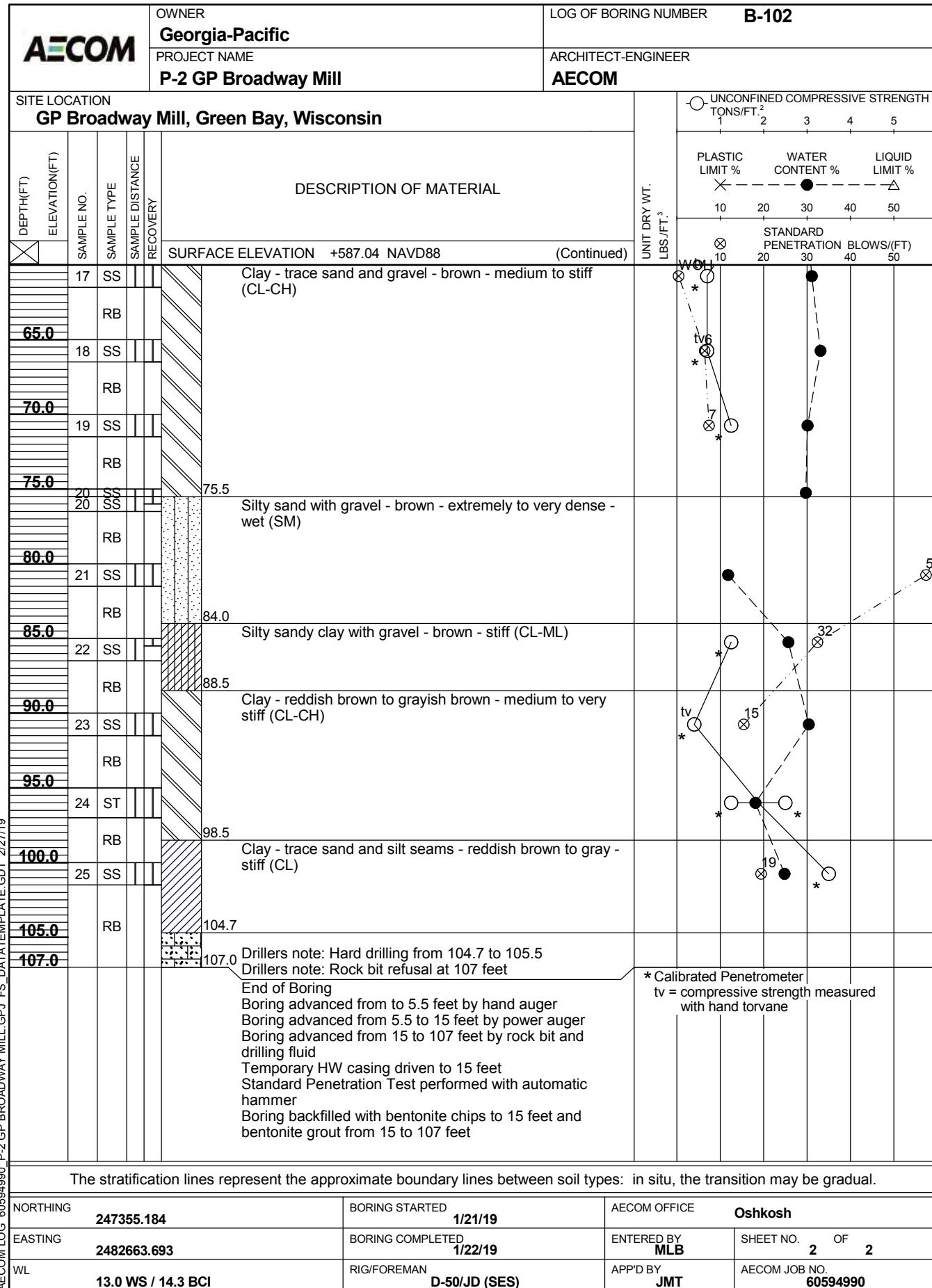
ARCHITECT-ENGINEER
AECOM

SITE LOCATION

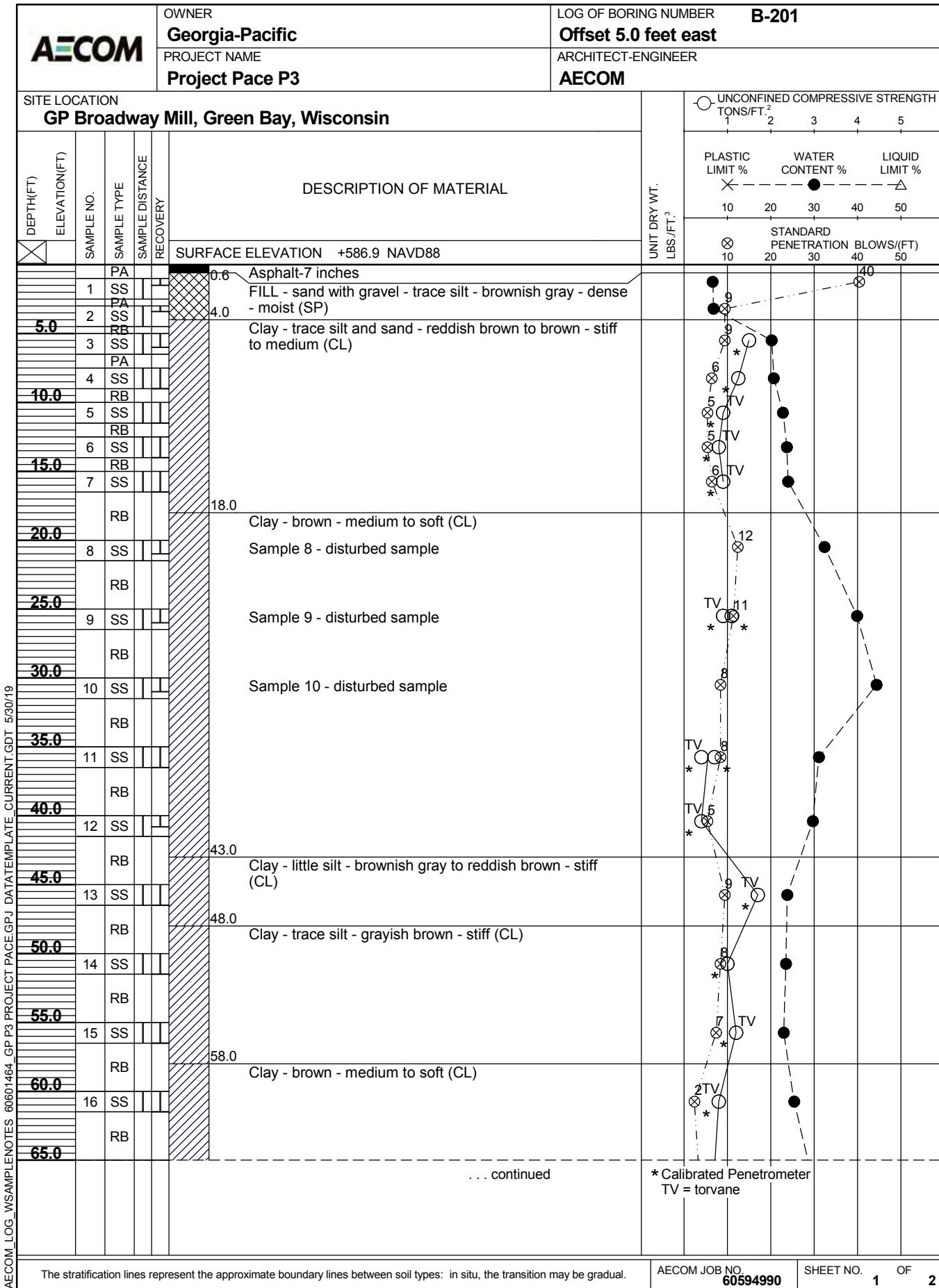
GP Broadway Mill, Green Bay, Wisconsin

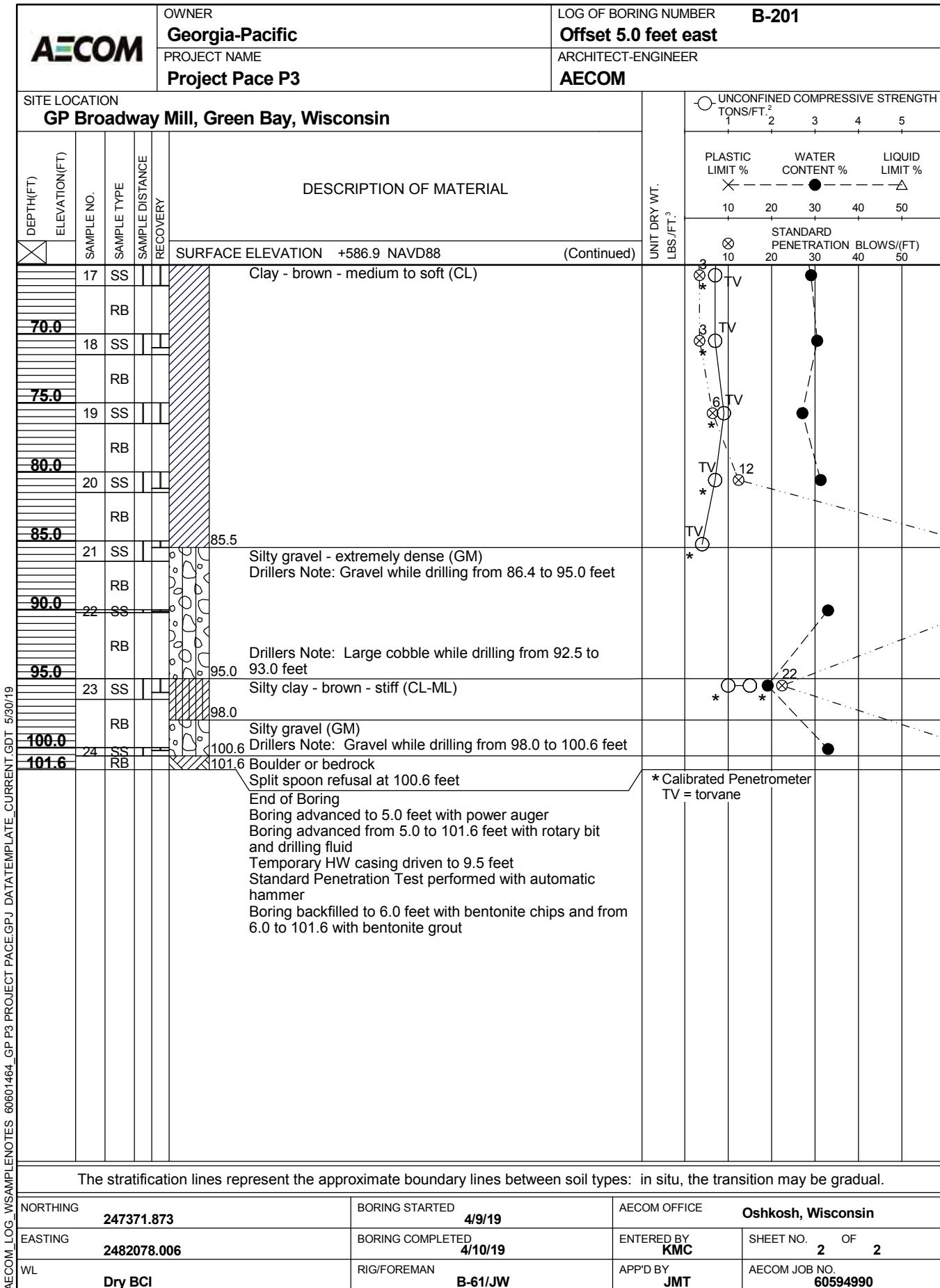


The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.



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







OWNER
Georgia-Pacific
PROJECT NAME
Project Pace P3

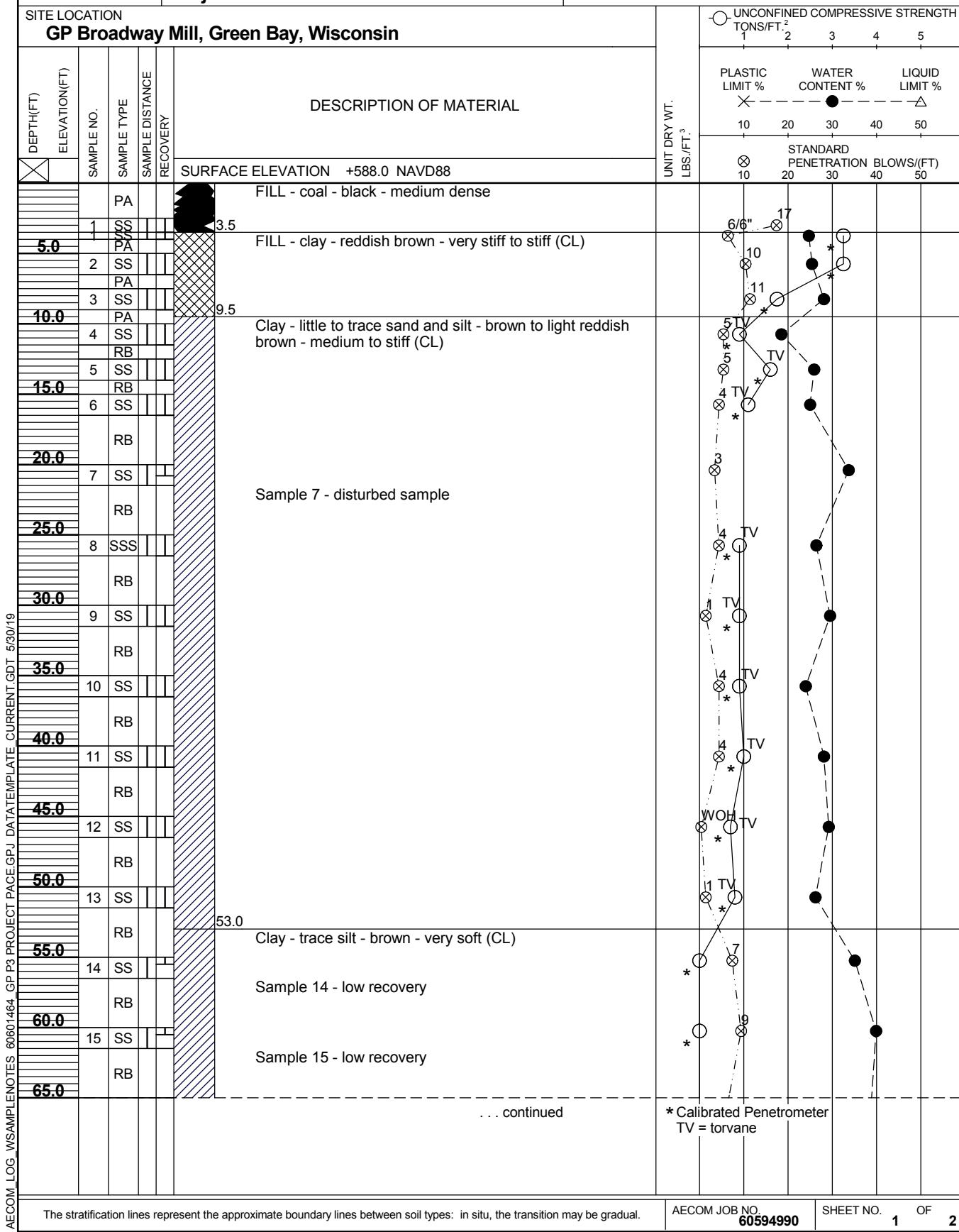
LOG OF BORING NUMBER B-204

B-204

ARCHITECT-ENGINEER
AECOM

SITE LOCATION

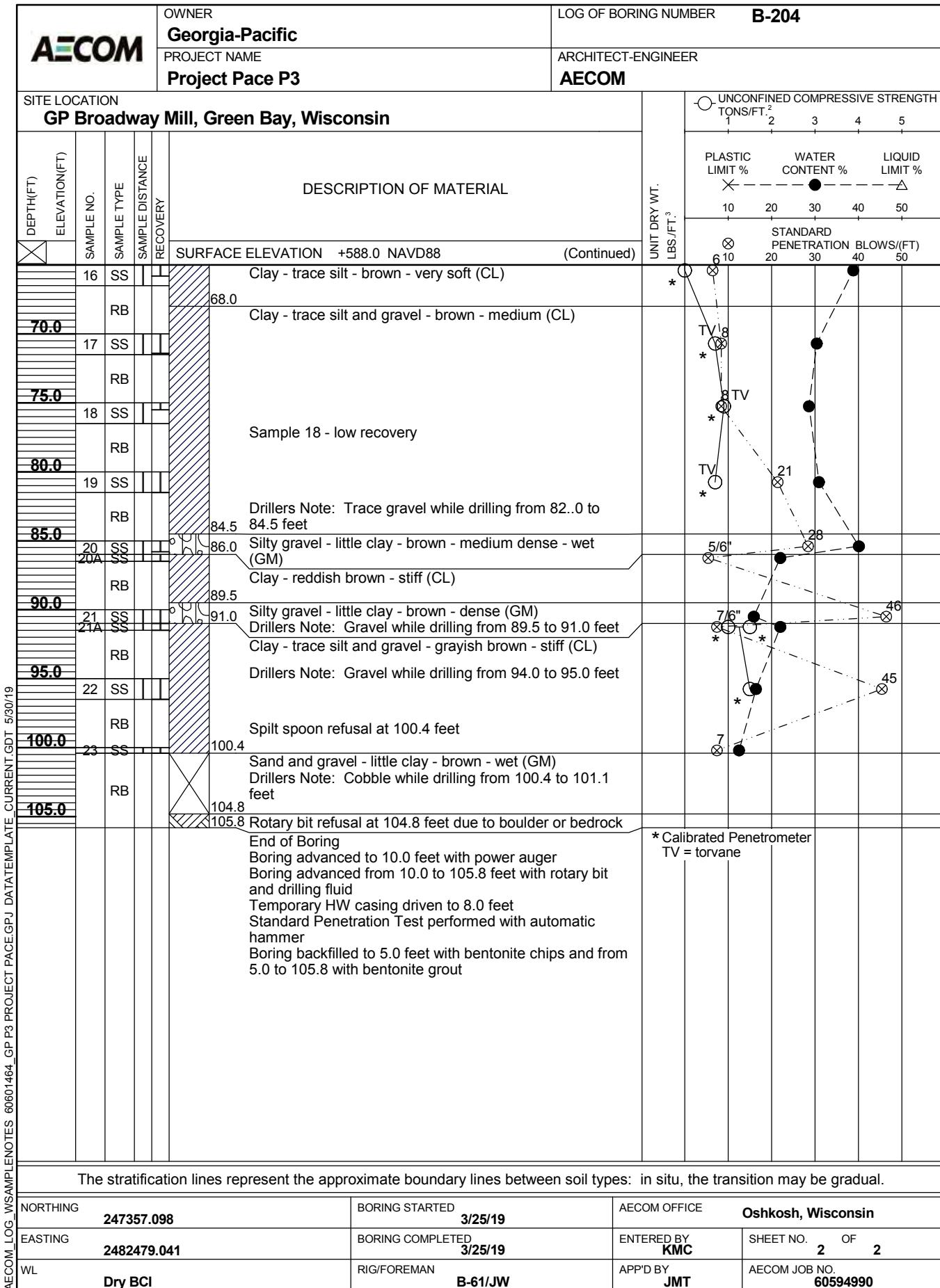
GP Broadway Mill, Green Bay, Wisconsin



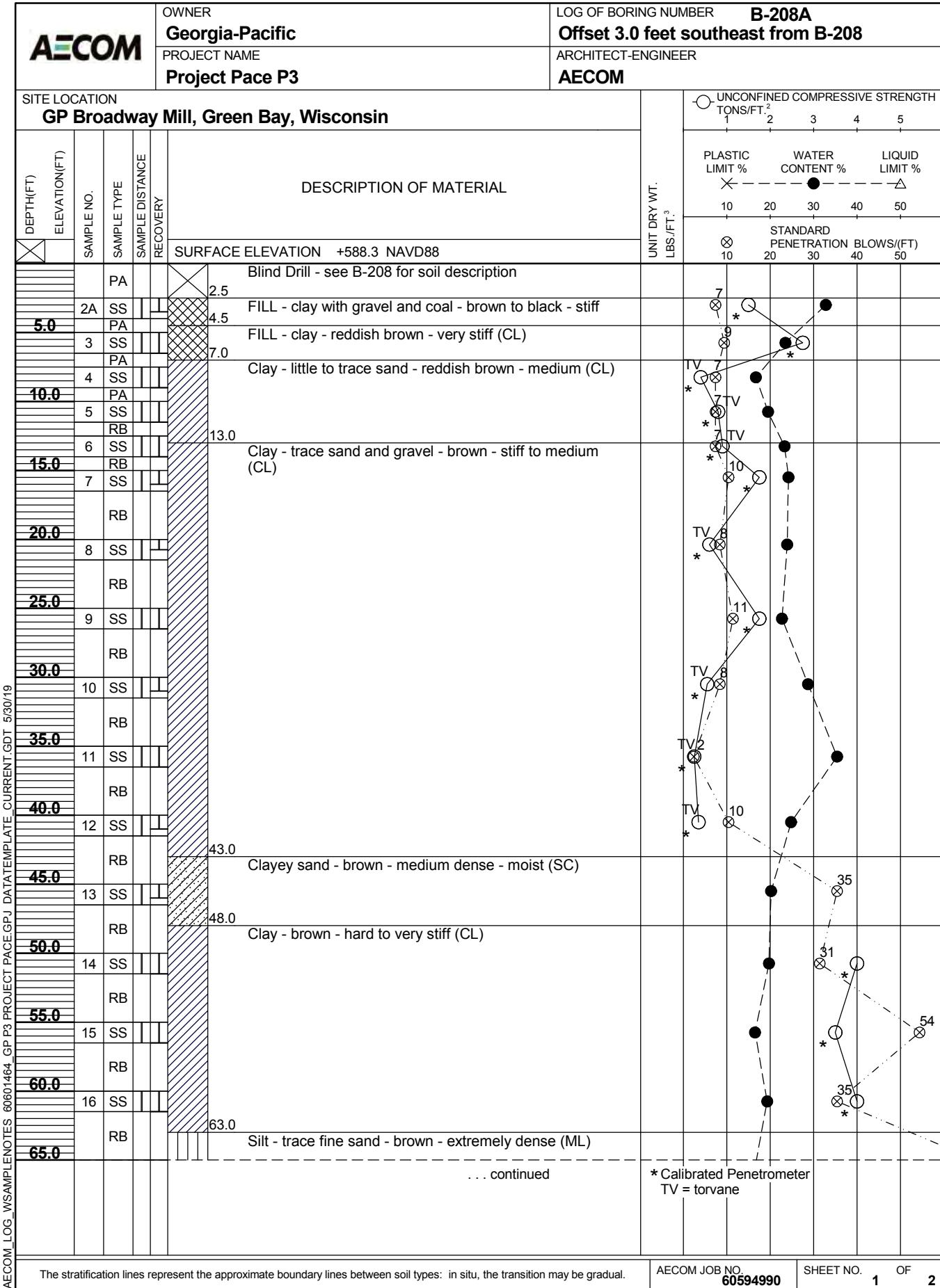
The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.

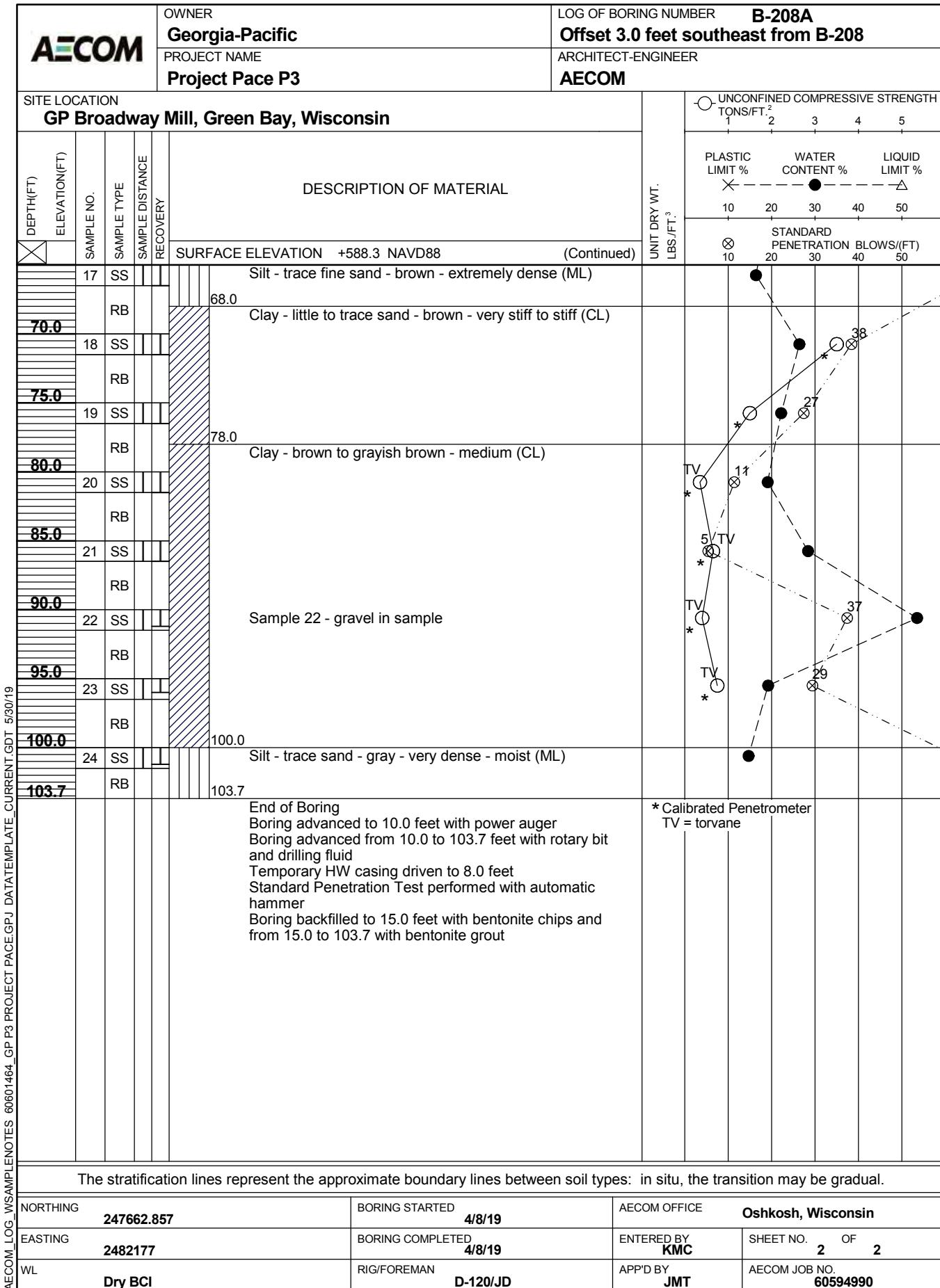
AECOM JOB NO.
60594990

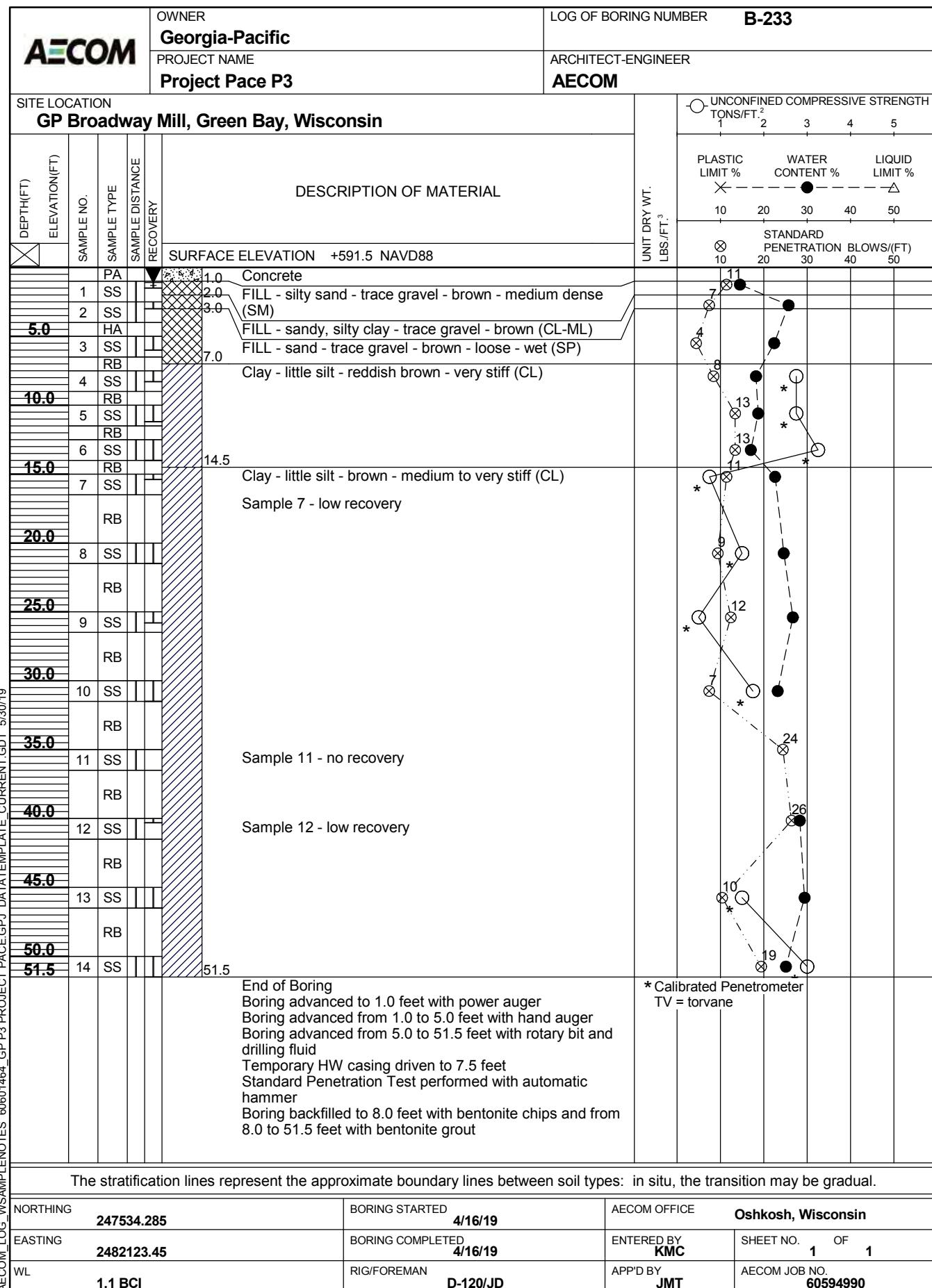
AECOM JOB NO. **60594990** SHEET NO. **1** OF **2**



OWNER Georgia-Pacific				LOG OF BORING NUMBER B-208			
PROJECT NAME Project Pace P3				ARCHITECT-ENGINEER AECOM			
SITE LOCATION GP Broadway Mill, Green Bay, Wisconsin							
DEPTH(FT)	ELEVATION(FT)	DESCRIPTION OF MATERIAL				UNIT DRY WT. LBS/FT. ³	UNCONFINED COMPRESSIVE STRENGTH TONS/FT. ² 1 2 3 4 5
		SAMPLE NO.	SAMPLE TYPE	SAMPLE DISTANCE	RECOVERY		
		SURFACE ELEVATION +588.3 NAVD88					
1	SS			FILL - coal - black - loose		9	
	HA			2.4		●	
4.0	SS			4.0 FILL - sand - brown - loose - moist (SP)		⊗	
				End of Boring Boring advanced to 4.0 feet with hand auger Standard Penetration Test performed with automatic hammer Boring terminated at 4.0 feet due to possible abandoned utility Boring backfilled with bentonite chips Offset boring B-208A performed 3.0 feet southeast of location			
<p>The stratification lines represent the approximate boundary lines between soil types: in situ, the transition may be gradual.</p>							
NORTHING 247662.857	BORING STARTED 4/8/19		AECOM OFFICE Oshkosh, Wisconsin				
EASTING 2482177	BORING COMPLETED 4/8/19		ENTERED BY KMC	SHEET NO. 1	OF 1		
WL	RIG/FOREMAN D-120/JD		APP'D BY JMT	AECON JOB NO. 60594990			







DATA TEMPLATE CURRENT.GBT 5/30/19
PROJECT PACE.GPJ
SAMPLER NOTES WSAMPLENOTES
LOG WSNCOM