



**Georgia-Pacific
Consumer Operations LLC**

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

December 20, 2019

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

RE: Georgia-Pacific Consumer Operations LLC (GP)– PFAS Site Investigation Work Plan
BRRTS #: 02-05-583452

Dear Mr. Lauridsen:

Please see attached PFAS Site Investigation Work Plan as requested by WDNR per the letter dated November 1, 2019. Please note that the proposed groundwater monitoring well locations may be subject to change depending on overhead and underground interferences that would prohibit the wells from being installed safely. GP is requesting WDNR concurrence that this work plan is acceptable prior to installation of the groundwater monitoring wells as identified in the work plan.

If you have any questions or concerns about this work plan, please do not hesitate to contact me via email at melissa.mrotek@gapac.com or by phone at 920-438-2233.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Mrotek', with a long horizontal line extending to the right.

Melissa Mrotek
Environmental Program Manager
Georgia-Pacific Consumer Operations LLC

December 18, 2019

AECOM Project No.
60619857

WDNR BRRTs No.
02-05-583452

Ms. Melissa Mrotek
Environmental Program Manager- Green Bay Operations
Georgia-Pacific Consumer Operations LLC
1919 S. Broadway
Green Bay, WI 54307-9130

Work Plan for Sampling Event for Per- and Polyfluoroalkyl Substances (PFOA and PFOS) at Georgia-Pacific's South Broadway Facility in Green Bay, Wisconsin

Dear Ms. Mrotek,

As requested, AECOM Technical Services, Inc. (AECOM) is providing Georgia-Pacific Consumer Operations LLC (GP) Green Bay Broadway Facility, with this Work Plan in order to conduct a sampling event to evaluate potentially impacted groundwater in the vicinity of GP's South Broadway Facility located at 1919 South Broadway Street, Green Bay, Brown County, Wisconsin (Subject Property). This sampling event Work Plan is in response to the Wisconsin Department of Natural Resources (WDNR) request for PFOA and PFOS (PFAS) sampling per a letter written to GP dated November 1, 2019.

Involved Parties Information

Responsible Party

Georgia-Pacific Consumer Operations LLC
Ms. Melissa Mrotek – Environmental Program Manager
Green Bay Operations
1919 South Broadway
PO Box 19130
Green Bay, WI 54307-9130
(920)438-1548

Consultant

TBD

Drilling Subcontractor

TBD

Laboratory

TBD

Site Description

The Subject Property is in the NW 1/4 of the SW 1/4 of Section 02, Township 23 North, Range 20 East. The postal mailing address is 1919 South Broadway Street in Green Bay, Wisconsin. The Wisconsin Transverse Mercator (WTM) general central location point is 44.4935968°, -88.029716°. The Subject Property is located on the west banks of the Fox River, south of the outlet of the river into Green Bay-Lake Michigan, as shown on Figure 1-Site Location Figure, included in the attachments. The general layout of the Subject Property is illustrated on the attached Figure 2-PFAS Monitoring Well Locations. The existing Subject Property site surface is mainly comprised of various buildings, paved areas, coal storage, and graveled areas, with some landscaping berms located along the Fox River. Operations at the Subject Property include steam and electrical generation, fiber recovery and bleaching, paper making, and paper converting. Many additions to the original Subject Property have been made since initial construction of the Mill in 1919. The Subject Property contains numerous manufacturing and warehousing buildings of varying size and age, wastewater treatment facilities, coal storage/conveyance/combustion facilities, and a complex

network of both above-ground and below-ground utilities (process wastewater, fire protection, gas transmission, electrical transmission, communications, sanitary waste, and storm water).

On April 16, 2019, the WDNR was notified of historical PCB contamination that was discovered as part of the GP Broadway Mill Expansion. This was confirmed in a subsequent submittal to the WDNR dated August 9, 2019. The area of PCB contamination is referred to as B-101 and is assigned BRRTs Number 02-05-583452. Utilizing the data provided by the Wisconsin Geological and Natural History Survey-Well Construction Report database and the WDNR Drinking Water Database, it was determined that there are no water supply wells located within a 1,200-foot radius of the outermost edge of the B-101 impacted area.

Site History

The original Subject Property was constructed in 1919 as the Fort Howard Paper Company. Since 1919 many additions have been made to the facility. Paper production began in 1920. In 1997 Fort Howard was acquired by James River Corp. of Richmond, Virginia. Fort James, the successor to James River, merged with Georgia-Pacific Corporation in 2000. The Subject Property contains numerous manufacturing and warehousing buildings of varying size and age, wastewater treatment facilities, boilers, and a complex network of both above-ground and below-ground utilities (process wastewater, fire protection, gas transmission, electrical transmission, communications, sanitary waste, and storm water). The Broadway Mill purchases all the virgin wood pulp that it uses, as the mill does not have the capability to produce pulp directly from virgin wood fiber.

All mill storm water is currently directed to an existing storm water management pond located on the south end of the mill site. GP treats and beneficially re-uses this collected storm water, and currently practices a "Zero Discharge" policy, to preclude the need for a storm water discharge permit from the WDNR. Combined mill effluent process wastewater and storm water is conveyed to a clarifier at the south end of the mill site for treatment. This effluent is then beneficially re-used within the mill process.

The fire protection system utilizes four pumps, including two pumps at the river intake located along the Fox River near Building 96 and two pumps internal to the mill. The fire protection system is not connected to the City of Green Bay municipal water system. The mill does draw potable drinking water from the City of Green Bay's system via two 12-inch diameter water main connections located in South Broadway Street near the intersection with Lombardi Avenue. Sanitary sewer discharges to an 18-inch diameter City of Green Bay collection sewer located in South Broadway Street, again near the intersection with Lombardi Avenue.

PFAS Assessment

The WDNR based this site investigation request on the Subject Property's long use as a paper manufacturing site and that paper making processes and operations have been associated with the use of (PFAS) nationally and in Wisconsin.

Please see Attachment A for additional information on the history and use of PFOA and PFOS compounds at the Subject Property.

Surrounding Properties

The Subject Property is bordered on the west by South Broadway Street, which contains private commercial and industrial operations and truck distribution centers. Residential properties are located to the southwest. The Fox River is located to the south and east. To the north, the Subject Property is bordered by an existing dock wall and coal delivery slip owned by Brown County, and the adjacent Canadian National Railway right-of-way.

Access agreements from adjacent property owners will not be required at this point.

Environmental and Ecological Setting

Topography

According to the United States Geological Survey (USGS) topographic map of the Subject Property area, and a review of the Google Earth application, the elevation of the Subject Property is approximately 635 feet above mean sea level (msl). Based on a review of these technical resources and AECOM's site visit, the Subject Property appears to be generally flat with the ground generally sloping from west to east towards the Fox River, however landscaping berms along the east side of the property prohibit surface water from leaving the site.

Soil / Geology

According to the USDA Web Soil Survey database, the Subject Property is predominantly underlain by fill land (Fd). Fill land slopes vary from 0 to 60 percent. The available water capacity of Fd is very low to high. Previous work done on site demonstrate that the fill material consists of coal and clayey soils overlying a layer of low strength clays which extend to depths of 90 to 105 feet below grade.

Site-specific geologic information was not identified during this assessment. A review of the Bedrock Geologic Map of Wisconsin: University of Wisconsin-Extension, Geological and Natural History Survey (Mudrey, M.G., Jr., Brown, B.A., and Greenberg, J.K., 1982) indicated that the bedrock beneath the Subject Property consists of the Ordovician aged Sinnipee Group. The Sinnipee Group consist of mostly dolomite with some limestone and shale. Primary formations for the Group are the Galena, Decorah, and Platteville Formations.

Groundwater / Hydrology

The very shallow (<10 feet below ground surface) groundwater beneath the Subject Property is anticipated to flow to the east toward the Fox River from the Subject Property. However, natural and man-made features and underground utilities, such as sanitary/storm sewer piping systems for the GP Facility, may influence the direction of local groundwater flow. In general, the shallow groundwater table is usually a reflection of surface topography, with the flow direction coinciding with the general site topography.

Archeological

An archeological study was performed on the site in 2007 by Old Northwest Research. This study indicated two archeological sites within the boundaries of the Broadway Mill, but both sites were probably destroyed during modern land disturbances at the mill. Neither site appears to be in the footprint of the study. However, we agree with the conclusion of the report that it is unlikely this site still exists due to the historic land disturbances in the area.

Sensitive Species, Habitats, and Ecosystems

A review of the U.S. Fish and Wildlife Service Information for Planning and Consultation (IPaC) database was executed for the Subject Property. Three species that are listed under the Endangered Species Act (1973) could potentially be affected at this location. The species that were listed are the threatened Norther Long-eared Bat (*Myotis septentrionalis*), the threatened Red Knot (*Calidris canutus rufa*), and the threatened Dwarf Lake Iris (flowing plant) (*Iris lacustris*). Eight species that are listed under the Migratory Bird Treaty Act (1918) and the Bald and Golden Eagle Protection Act (1940) could potentially be affected at this location. The species that were listed are the Bald Eagle (*Haliaeetus leucocephalus*), Golden-winged Warbler (*Vermivora chrysoptera*), Henslow's Sparrow (*Ammodramus henslowii*), Lesser Yellowlegs (*Tringa flavipes*), Red-headed Woodpecker (*Melanerpes erythrocephalus*), Rusty Blackbird (*Euphagus carolinus*), Willow Flycatcher (*Empidonax traillii*), and the Wood Thrush (*Hylocichla mustelina*).

The IPaC lists the location as a non-critical habitat for any of the species listed above. Several factors indicted that it is unlikely that any of the listed species will be encountered during site activity. Due to the historical development of the site, it is listed as a non-critical habitat for any of the listed species.

Using the tools on the WDNR website, a preliminary screening for endangered/threatened species for the Subject Property indicates endangered species to be present on site as there are Peregrine Falcon's nesting in the baghouse building. Our understanding is that this study will not affect any endangered species.

The City and WDNR maps do not show wetlands to be present within the project boundary and the WDNR determined that there are no wetlands within the site boundary. Review of current FEMA flood plain mapping indicates that portions of the near-river shoreline within the proposed project limits are currently designated as flood fringe (floodplain) but the study will not impact those areas.

Field Investigation and Sampling Plan

Three well locations were selected downgradient of the facility along the Fox River. The locations are downgradient from the B-101 PCB site and from the area in which the tank containing fire-fighting foam had been located. Due to the physical limitations on the Subject Property these three locations were selected as representative of the groundwater quality.

The field investigation is the following:

- Subsurface investigation by means of a truck-mounted direct-push rig will be conducted. The sub-contracted drilling company will be responsible for scheduling the public utility clearance activity. GP personnel will be responsible for marking and clearing the area for their known utilities on site. The drilling company will advance three borings at predetermined locations at the site. The borings will be advanced to a depth of approximately 14.0-feet below ground surface (bgs) then converted to temporary monitoring wells. Groundwater is anticipated to be between 4.0 and 10.0-feet bgs. Approximate borings are illustrated on Figure 2-PFAS Monitoring Well Location included in the attachments. Equipment will be decontaminated between borings using verified PFAS free water and Alconox detergent by the subcontractor per the subcontractors "PFAS Sampling Procedure" protocol.
- Documentation (bore-hole log, photographs, and field notes) of observations including soil/fill type, refuse present, and visual and olfactory observations of the subsurface materials.
- Three temporary, 2-inch groundwater monitoring wells will be installed at the predetermined locations, as illustrated in Figure 2-PFAS Monitoring Well Locations included in the attachments. The wells will be developed (i.e. purged) following installation and allowed to stabilize prior to sampling.
- The wells will be sampled using PFAS free protocols. The wells will be purged for three well volumes and sampled via a peristaltic pump with non-Teflon lined HDPE tubing using low-flow sampling techniques. Groundwater samples will be collected from each well for laboratory analysis into laboratory-supplied 250mL HDPE plastic sample bottles for the PFAS samples. Sampling will be conducted by experienced PFAS sampling teams. Samplers need to be aware of the products that are known to have tested positive for PFAS compounds, as well as identifying products that are appropriate to use in the sampling environment. Care will be taken by the sample teams to use PFAS-free sampling protocols.
- Soil cuttings and groundwater will be placed in separate drums. The drums will be stored on site until a disposal pick-up is scheduled. If the laboratory analysis indicates non-impacted media, the soils may be thin spread across the site. Groundwater will be disposed of properly depending on the results of the analysis.

Laboratory Analytical Methods and Quality Assurance

Samples collected as part of this investigation will be labeled, placed on ice, and transported under standard chain of custody practices to the selected laboratory that is experienced in conducting analysis of PFAS compounds, for the analysis of PFOA and PFOS by EPA Method 537 Modified - Isotope Dilution. The samples will be analyzed on a standard (21 day) turn-around-time. One duplicate sample, one field blank sample, and two equipment blanks will be collected for quality control purposes. A matrix spike/matrix spike duplicate sample is not required due to the isotope method used for determining PFAS concentrations. Level IV quality control reporting will be provided by the lab.

Project Schedule

Field tasks are anticipated to commence in March 2020. A Subsurface Investigation report in general conformance to NR 716 will be submitted to the WDNR within approximately three to four weeks of receipt of the analytical data.

<u>Project Phase</u>	<u>Date</u>
Notification Letter Received	November 1, 2019
Work Plan Submitted to WDNR for Review	January 1, 2020
Receive WDNR concurrence with Work Plan	February 2020
Soil Borings and Well Installation	March 2020
Sampling	April 2020
Analytical Receipt	May 2020
Draft Letter Report	June 2020

Conclusion

AECOM proposes the advancement of three soil borings in the immediate area of the Subject Property; see Figure 2-PFAS Monitoring Well Location included in the attachments. The borings will be advanced to a depth of approximately 14.0 feet bgs, and, once logged, will then be converted to temporary monitoring wells, developed, allowed to stabilize, then the groundwater will be sampled. Groundwater samples will be analyzed for by EPA Method 537 Modified - Isotope Dilution.

Following receipt of the laboratory analytical results, the selected consultant will prepare a letter report documenting the scope of our work activities and summarizing the results of the implementation of the work plan. The consultant will provide the WDNR with a professional opinion of the observations from the field work and recommendations for further work, if any. The report will include a site location map, site plan, representative site photographs, and supporting documentation, as appropriate.

We look forward to working with you on this project. If you have any questions regarding the information contained in this work plan, please contact us at your convenience.

Yours sincerely,



Albert W. Cole
Senior Project Manager
AECOM
D: 920-236-6721
M: 920-295-4686
E: albert.cole@aecom.com

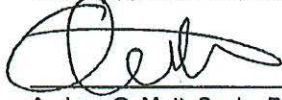


Andrew G. Mott, PG
Senior Project Hydrologist
AECOM
D: 920-236-6713
M: 920-379-6024
E: andrew.mott@aecom.com

enclosures: Figure 1-Site Location Map
Figure 2-PFAS Monitoring Well Locations
Attachment A

Hydrogeologist Certification

I, Andrew G. Mott, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

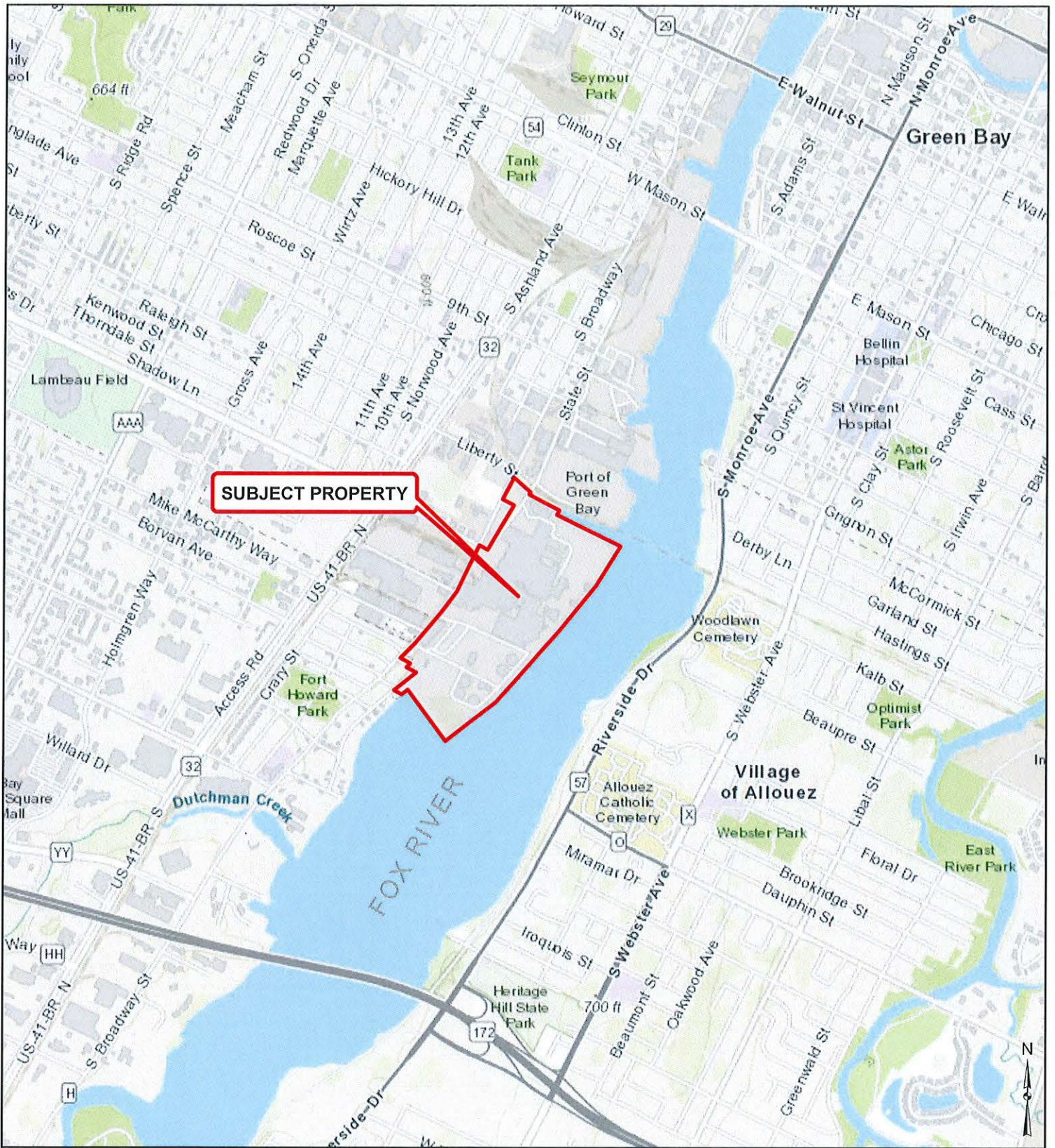


Andrew G. Mott; Senior Project Hydrogeologist

12/18/19

Date





AECOM
 AECOM GREEN BAY
 2985 SOUTH RIDGE ROAD, SUITE B
 GREEN BAY, WI 54304
 920.468.1978 tel 920.468.3312 fax
 www.aecom.com

GP
Georgia-Pacific
 Consumer Products
GREEN BAY BROADWAY
 CONFIDENTIAL
 ©2019
 Confidential and Proprietary informations
 of GPCP IP Holdings, LLC all rights
 reserved. Duplication prohibited without
 prior written consent.

				PROJECT: PFAS SAMPLING	
				-	
				DET NAME: SITE LOCATION	
			DR. MTP	CH. AWC	DATE: 12/11/19
			JOB #: 60619857		
			-		
A	12/09/2019	INTERNAL REVIEW	MP	FIGURE 1	
NO.	DATE	REVISION	BY	DWG #: SITE LOCATION FIGURE	
					REV A



PFAS Monitoring Well Locations

◆ Proposed PFAS Monitoring Well Installation Location

NOTE:

All proposed monitoring well installation locations are approximate.

				PROJECT: PFAS SAMPLING						
				MACH NAME: - -						
<p>AECOM GREEN BAY 2985 SOUTH RIDGE ROAD, SUITE B GREEN BAY, WI 54304 920.468.1978 tel 920.468.3312 fax www.aecom.com</p>		<p>GREEN BAY BROADWAY 52019 CONFIDENTIAL</p>		DET NAME: PFAS MONITORING WELL LOCATIONS						
				DR.	MTP	CH.	JM	DATE: 12/09/19	-	-
<p>NO.</p>		<p>DATE</p>		<p>BY</p>		AECOM #:		JOB #:		REV
						12/09/2019		MTH		
						FIGURE 2		DWG #: PFAS MONITORING WELL LOCATIONS		A

Confidential and Proprietary information of GPCP IP Holdings, LLC all rights reserved. Duplication prohibited without prior written consent.



**Georgia-Pacific
Consumer Operations LLC**

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

June 28, 2019

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

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

Dear Mr. Lauridsen:

On April 16, 2019, Mr. Jeff Maletzke of AECOM provided notification on behalf of Georgia-Pacific Consumer Operations LLC's Green Bay Broadway mill (GP) located at 1919 South Broadway, Green Bay, Wisconsin to Wisconsin Department of Natural Resources (Department) of soil sampling results for Polychlorinated Biphenyls (PCBs) and Toxicity Characteristic Leaching Procedure (TCLP) results for metals and select Volatile Organic Compounds (VOCs). The samples were taken from a portion of the Broadway Mill in connection with a proposed construction project at the mill. AECOM is in the process of preparing a workplan to further evaluate the area of the proposed mill expansion.

Following that notification, the Department submitted an information request (Request) to GP asking for information regarding per- and polyfluoroalkyl substances (PFAS). The Request was dated May 8, 2019 and asked for a response within 60 days, or by July 8, 2019.

GP notes that the Department's request is not based on any indication that PFAS chemistries have ever been manufactured or applied in the manufacturing process over the history of the Green Bay mill. In fact, GP's research has concluded that PFAS chemistry has never been intentionally added in the manufacturing process at the Green Bay mill.

The Department's requests are reproduced below, and GP's responses follow:

1. Describe the use and manufacture of PFAS or PFAS-containing materials at the Facility from the receipt of the material to the final use, sale or disposal of PFAS or PFAS-containing materials. Include in that description the information on all entities responsible for its manufacture and use; the years involved in its manufacture and use; what it was used to manufacture; whether any product containing PFAS was used or tested at the Facility; the areas of the Facility where it was manufactured and used; and whether it was emitted from any air emission sources.

Mr. Keld Lauridsen
June 28, 2019
Page 2

Response: GP has never manufactured or intentionally added PFAS or PFAS-containing materials (collectively, PFAS) as part of its paper manufacturing process in Green Bay. The mill has utilized at times small volumes of cleaners or other maintenance type chemicals, some of which may have contained PFAS in very low amounts.

GP does utilize large quantities of recycled fiber in the production of its product line. Recycled stock includes, among other things, tissue and towel products, office paper, containerboard and corrugated boxes. Some of this recycled stock may from time to time include trace amounts of PFAS, which could end up in the production process. While product with a high percentage of recycled content may contain trace amounts of Perfluoroalkyl substances, all such products has been determined to be safe. In addition, no PFOA or PFOS has been detected in the product.

GP also had a tank of firefighting foam at some point at the mill. The foam was recently disposed of offsite in metal drums and was processed as waste to energy. The foam was not tested for PFAS and to the best of GP's knowledge the foam was never employed for any purpose.

Additional information is provided in response to the other questions, below.

2. Describe, using generic and trade names, the materials containing PFAS that were transported to or from, disposed of, stored, produced, used, handled, managed, or processed at or related to the Facility. The description should include the physical form (solid, liquid, gas) of any materials and the type of container used to transport, store, produce, use, handle, manage, or process the PFAS.

Response: As explained in response to Question 1, above, GP never produced, intentionally processed or knowingly disposed of PFAS at its Green Bay operations. PFAS may have been a low quantity component of some maintenance type chemicals, see the table below.

Chemical Name	Use	Material Type	Container Type
LPS Electro Contact Cleaner	Currently used	Liquid	Aerosol Can
3M Novec 7100 Engineered Fluid	No longer used	Liquid	Plastic drums or Totes
Pow-R-Wash CZ*	Currently used	Liquid	Aerosol Can
Zonyl FSN Fluorosurfactant	No longer used	Information no longer available	
Braided Graphite Packing (Styles 1627/1627D)*	Currently used	Solid	Box

* Products have been reformulated to no longer contain PFAS components.

3. Describe the transportation to or from, production, disposal off, storage, use, handling, management, and processing of PFAS-containing material related to the Facility. Include in each description where and in what process at the Facility, the transportation to or from, disposal storage, use, handling, management, and processing of PFAS-containing material occurred at the Facility. *E.g.*, the material was disposed of in landfill, drained to soil sewer drain, etc. If the point of transportation to or from, production of, disposal of, storage, use, handling, management, or processing of PFAS-containing material changed over time, please provide dates of such changes and what changes were made.

Response: See response to question 1. As a general matter, maintenance type chemicals were purchased from suppliers who shipped them to the Green Bay mill via commercial carrier. Based on information available today, these are all believed to have been shipped in containers, never in bulk. These Specialty Chemicals were stored indoors, on shelves or in storage containers. The table listed under question 2, above, contains a list of chemicals which may have contained small amounts of PFAS:

Chemical Name	Use	Area Used	Use Type	Disposal
LPS Electro Contact Cleaner	Currently used	Maintenance	Cleaning / degreasing of electrical cabinets	Hazardous waste**
3M Novec 7100 Engineered Fluid	No longer used	Process	Cleaning / degreasing of felts/wires on paper machine	Material was 100% volatile, if material was disposed of, it would have been disposed of as hazardous waste
Pow-R-Wash CZ*	Currently used	Maintenance	Cleaning / degreasing of elevator electrical cabinets and elevator door switches	Hazardous waste**
Zonyl FSN Fluorosurfactant	No longer used	Information no longer available		
Braided Graphite Packing (Styles 1627/1627D)*	Currently used	Maintenance	Pump packing material to seal	General trash disposed of in landfill

* Products have been reformulated to no longer contain PFAS components.

** Material was contained in an aerosol can. Facility has an aerosol can puncturing device that would have emptied the aerosol and remaining contents into a hazardous waste collection drum and shipped out as hazardous waste. Punctured cans are sent to a metal recycling facility.

4. Estimate the amounts of PFAS-containing materials that were transported to or from, disposed of, stored, produced, handled, managed, or processed at or related to the Facility.

Response: See table below.

Chemical Name	Use	Area Used	Estimated Usage
LPS Electro Contact Cleaner	Currently used	Maintenance	Maintenance chemical usage not tracked. Estimated to be < 10 lbs/year since 1996.
3M Novec 7100 Engineered Fluid	No longer used	Process	No indication of actual use.
Pow-R-Wash CZ*	Currently used	Maintenance	Approved for use at facility in 2011. Reformulated in 2015 to no longer contain PFAS components. For usage from 2011 through 2015, estimated to be < 10lbs/year.
Zonyl FSN Fluorosurfactant	No longer used	Information no longer available	
Braided Graphite Packing (Styles 1627/1627D)*	Currently used	Maintenance	Approved for use at facility in 2011. Reformulated in 2014 to no longer contain PFAS components. For usage from 2011 through 2014, estimated to be < 10lbs/year.

* Products have been reformulated to no longer contain PFAS components.

5. Identify which part of GP's operations, including storage, involving PFAS or PFAS-containing materials, generated waste, including but not limited to wastes resulting from spills of liquid materials and wastes generated by cleaning and maintenance of equipment, inventory cleanout, off-specification determined wastes and machinery. Include locations where the waste was generated and stored, and an estimation of the volume or mass of the waste generated and stored.

Mr. Keld Lauridsen

June 28, 2019

Page 5

Response: GP stored the cleaners and other chemicals listed in response to Questions 2 through 4 above, indoors, on shelves or in chemical containments. See the table in response to Question 3 for disposal of wastes.

6. Identify releases of PFAS or PFAS-containing materials and describe the methods used to clean up the releases including but not limited to:
 - a. The types of materials spilled,
 - b. The media onto or into which the spill occurred,
 - c. The materials used to clean up those spills,
 - d. The methods used to clean up those spills, and
 - e. Where the materials used to clean up those spills were disposed of.

Response: GP has no knowledge of any such releases of PFAS at the Broadway Mill during the time it has owned and operated the facility.

7. Describe the cleaning and maintenance of equipment and machinery involved in PFAS operations, including but not limited to:
 - a. The types of materials used to clean and maintain this equipment/machinery,
 - b. The monthly or annual quantity of each such material used,
 - c. The disposition of those materials used in cleaning equipment, and
 - d. Where the materials are/were disposed of.

Response: The term "PFAS operations" is vague in the context of mill operations described above. PFAS was never intentionally utilized as a component or input of the papermaking process in Green Bay. Therefore, there was no cleaning and maintenance of equipment and machinery involved in PFAS operations. However, maintenance type chemicals that may contain small amounts of PFAS were used for cleaning and degreasing purposes. See the table in response to Question 3 above.

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

Response: GP has no knowledge of any such spills, leaks, releases or discharges of PFAS at the Broadway Mill during the time it has owned and operated the facility.

Sincerely,



Melissa Mrotek

Environmental Program Manager – Green Bay Operations

Georgia-Pacific Consumer Operations LLC