

Lauridsen, Keld B - DNR

From: Lauridsen, Keld B - DNR
Sent: Tuesday, April 28, 2020 10:49 AM
To: Mrotek, Melissa A
Cc: Chronert, Roxanne N - DNR; Soyer, Jenna A - DNR
Subject: Compliance Assistance Response - GP Broadway Mill Expansion (BRRTS # 02-05-583452)

Melissa,

The DNR received your compliance assistance request on April 27, 2020. After review, the DNR concurs with the alternative schedule to § NR 716.11(2)(2g) as a result of Covid-19.

It is DNR's understanding that Georgia Pacific has implemented a policy only allowing contractors supporting essential operations or critical projects to enter the facility at this time.

You are proposing to reschedule the PFAS investigation field work during June 2020. If the proposed work schedule changes significantly, a follow-up compliance request should be submitted.

Thanks,

Keld

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Lauridsen, Keld B - DNR
Sent: Monday, April 27, 2020 10:46 AM
To: Mrotek, Melissa A <MELISSA.MROTEK@GAPAC.com>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Thanks for the quick response Melissa. DNR will review the request and get back to you.

-Keld

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Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Mrotek, Melissa A <MELISSA.MROTEK@GAPAC.com>
Sent: Monday, April 27, 2020 10:22 AM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>

Cc: Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>

Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Keld,

Please see the responses to the six questions below. Originally, GP had requested an extension for 6-8 weeks from the original scheduled PFAS sampling that was to take place the week of March 30th. The sampling is now scheduled to occur the week of May 11th. However, in light of the extension of the Wisconsin Safer at Home Order, GP is now requesting an extension until the end of June to complete the work. This extension request is reflected in the responses to the six questions below.

1. **Name of the facility/site:** Georgia-Pacific Consumer Operations LLC
2. **Contact information for the central point of contact for the facility/site:**
 1. **Name of person notifying:** Melissa Mrotek
 2. **Address:** 1919 South Broadway
 3. **City/Town:** Green Bay
 4. **State/Province:** WI
 5. **Zip/Postal Code:** 54304
 6. **Email Address:** melissa.mrotek@gapac.com
 7. **Phone Number:** 920-438-2233 (office) or 920-639-1548 (cell)
 8. **Primary DNR Contact for Site or Facility:** Keld Lauridsen
3. **State what specific statute/rule/permit condition the individual party is looking for flexibility from.**

GP is seeking flexibility from NR716.11 that requires the field investigation be started within 90 days of submittal of the work plan. GP submitted a PFAS Site Investigation Work Plan on December 20, 2019 as requested by WDNR under NR716.07 and NR716.09.

4. **Include the reasoning/rationale for the request and related to the COVID19 emergency (1 paragraph summary on why the COVID19 emergency justifies the assistance sought and what actions the requestor took prior to the request to meet the requirement).**

GP has contracted Tetra Tech out of Ann Arbor, MI to complete the sampling who also sub-contracted On-Site Environmental out of Sun Prairie, WI to complete the groundwater monitoring well installation. Work was scheduled to take place the week of March 30, 2020. On Monday, March 16, 2020, GP requested an extension for 6-8 weeks as a result of the COVID19 emergency. At that time efforts were underway to minimize the spread of the virus within the State of Wisconsin and at the GP facility by practicing social distancing, restricting travel and restricting contractors from coming on site from outside the local area. The PFAS groundwater monitoring well installation and sampling was re-scheduled to take place the week of May 11th. On March 25, 2020, Wisconsin Department of Health Services (DHS) issued Emergency Order #12 Safer at Home Order that was in effect from March 25th through April 24th. This order has subsequently been extended under Emergency Order #28 from April 24th through May 26th. Under both Emergency Orders, restrictions are identified (including travel) to minimize the spread of the virus with exceptions provided for essential business operations. GP is considered an essential business and has continued to operate. GP has implemented a policy that discontinued all non-essential contract work and restricts contractors from coming on site to only those that are needed to support essential operation or critical projects and have been approved through the screening process.

5. **Include bulleted points of what measures will be taken to mitigate/minimize the potential environmental impacts (if any).**
 1. The PFAS site investigation stemmed from the discovery of historical PCB soil contamination on the facility.

2. GP's research has concluded that PFAS chemistry has never been intentionally added in the manufacturing process at the Broadway Mill, and has no knowledge of any PFAS releases or discharges at the Broadway mill during the time it has owned and operated the facility.
 3. No measures will be taken.
6. **Specify the specific time period that the request is for including the rationale.**

Extension request is from March 19, 2020 through June 30, 2020. GP will continue the policy of restricting contractors from coming on site at least until the Wisconsin DHS Emergency Order #28 expires (May 26th) if not longer to continue to minimize the spread of the virus and reduce potential exposure to employees. Both Tetra Tech and On-Site Environmental are from outside the local area. GP is currently working with Tetra Tech to reschedule the work in the month of June and potentially could take place the weeks of June 8th, June 15th or June 22nd.

Please advise if the extension request will be granted until June 30, 2020. Please feel free to contact me if there are any questions or concerns with the responses provided.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: 920-438-2233
Cell: 920-639-1548
Fax: 404-654-4858

From: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Sent: Thursday, April 23, 2020 5:06 PM
To: Mrotek, Melissa A <MELISSA.MROTEK@GAPAC.com>
Cc: Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Sent by an external sender

Melissa,

DNR has recently changed our process for how to handle work delays due to the COVID19 pandemic. I know I have previously provided my concurrence with the delay to collect groundwater samples for PFAS, but I am now required to ask for some additional information. I apologize for the inconvenience but I need to ask you to respond to the 6 questions listed below:

1. Name of the facility/site
2. Contact information for the central point of contact for the facility/site:
 1. Name of person notifying
 2. Address
 3. City/Town
 4. State/Province
 5. Zip/Postal Code
 6. Email Address
 7. Phone Number
 8. Primary DNR Contact for Site or Facility
3. State what specific statute/rule/permit condition the individual party is looking for flexibility from.

4. Include the reasoning/rationale for the request and related to the COVID19 emergency (1 paragraph summary on why the COVID19 emergency justifies the assistance sought and what actions the requestor took prior to the request to meet the requirement).
5. Include bulleted points of what measures will be taken to mitigate/minimize the potential environmental impacts (if any).
6. Specify the specific time period that the request is for including the rationale.

Call me if you have any questions or concerns.

Hope all is well on your end.

Thanks,

-Keld

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Lauridsen, Keld B - DNR

Sent: Tuesday, March 17, 2020 1:22 PM

To: 'Mrotek, Melissa (GBY)' <MELISSA.MROTEK@GAPAC.com>

Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Thanks Melissa.

-Keld

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>

Sent: Tuesday, March 17, 2020 1:07 PM

To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>

Cc: Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>

Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Keld,

The work has been tentatively rescheduled for the week of May 11th. If anything changes to the schedule, I will let you know.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: 920-438-2233
Cell: 920-639-1548
Fax: 404-654-4858

From: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Sent: Tuesday, March 17, 2020 10:50 AM
To: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Cc: Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Sent by an external sender

Melissa,

Given the circumstances, your proposal to postpone the PFAS groundwater sampling at the above site is acceptable.

Please let me know when the sampling event has been rescheduled.

Thanks,

-Keld

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Sent: Monday, March 16, 2020 3:59 PM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Keld,

With respect to the COVID-19 Pandemic, GP is proposing to postpone the installation of the ground water monitoring wells and subsequent PFAS sampling for six to eight weeks (dependent on contractor availability). GP was originally scheduled to have the work take place the week of March 30th. However, given the recent efforts to practice social distancing to minimize the spread of this virus, GP is proposing the postponement since this effort will require contractors/consultants to come in from outside the local area and outside of the state. Is this proposal acceptable? Please advise.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: 920-438-2233
Cell: 920-639-1548
Fax: 404-654-4858

From: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Sent: Wednesday, February 26, 2020 10:22 AM
To: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Sent by an external sender

Thanks for the update Melissa.

-Keld

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

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

From: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Sent: Tuesday, February 25, 2020 3:41 PM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Cc: POMERVILLE, JACQUELYN <JACQUELYN.POMERVILLE@GAPAC.COM>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Keld,

As an update to our PFAS work plan, GP has issued a contract to Tetra Tech to complete the installation of the groundwater monitoring wells as well as sample collection. The samples will be analyzed by Vista Analytical Laboratories. The work is tentatively scheduled for the week of March 30th to complete the well installation and sampling. Please let me know if you have any questions.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: 920-438-2233
Cell: 920-639-1548
Fax: 404-654-4858

From: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Sent: Thursday, January 23, 2020 2:41 PM

To: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Cc: Maletzke, Jeff <Jeff.Maletzke@aecom.com>; Cole, Albert <Albert.Cole@aecom.com>; Romback-Bartels, Jean - DNR <Jean.RombackBartels@wisconsin.gov>; Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Sent by an external sender

Melissa,

Please refer to pages 13-16 in the document linked below for a list of the 36 compounds requested.
<https://dnr.wi.gov/topic/LabCert/documents/EA-19-0001-C.pdf>

Let me know if you need anything else.

-Keld

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Sent: Thursday, January 23, 2020 8:48 AM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Cc: Maletzke, Jeff <Jeff.Maletzke@aecom.com>; Cole, Albert <Albert.Cole@aecom.com>; Romback-Bartels, Jean - DNR <Jean.RombackBartels@wisconsin.gov>; Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>
Subject: RE: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Thanks Keld!

Regarding the first bullet point on the 36 parameters, is there a specific list that you could send me or direct me to? I've attempted to look for it, but haven't had much success.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: 920-438-2233
Cell: 920-639-1548
Fax: 404-654-4858

From: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Sent: Wednesday, January 22, 2020 11:23 AM
To: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Cc: Maletzke, Jeff <Jeff.Maletzke@aecom.com>; Cole, Albert <Albert.Cole@aecom.com>; Romback-Bartels, Jean - DNR

<Jean.RombackBartels@wisconsin.gov>; Chronert, Roxanne N - DNR <Roxanne.Chronert@wisconsin.gov>; Nobile, Trevor W - DNR <Trevor.Nobile@wisconsin.gov>

Subject: Notice to proceed, PFAS work plan, GP Broadway Mill Expansion site (BRRTS # 02-05-583452)

Sent by an external sender

Melissa,

DNR has reviewed the PFAS work plan for the above referenced site received as a hard copy on December 27, 2019. Based on this review, DNR provides the following comments:

- Utilize EPA Method 537 modified 1.1 to get 36 parameters.
- Depending on future PFAS analytical results from the temporary wells, additional sampling/investigation may be required to satisfy the requirements of the NR700 series.
- If at all possible, the temporary wells should be kept to allow for future resampling.
- Provide analytical results as soon as possible once available from the lab. Also provide the Level 4 data package.
- On future maps, please identify the former location of the firefighting foam tank.

Let me know if we need to discuss anything further. This email serves as your notice to proceed.

Thanks,

-Keld

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Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>

Sent: Wednesday, January 8, 2020 7:38 AM

To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>

Subject: RE: Site Investigation Work Plan

Keld – please see attached.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: 920-438-2233
Cell: 920-639-1548
Fax: 404-654-4858

From: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Sent: Tuesday, January 7, 2020 9:12 AM
To: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Subject: RE: Site Investigation Work Plan

Sent by an external sender

Melissa,

I have received the PFAS SIWP for the GP Broadway Mill site. Looks like it was received on December 27, 2019. Do you have an electronic copy available that you could send my way?

Hope all is well with you and Happy New Year.

-Keld

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Keld B. Lauridsen

Phone: (920) 662-5420

Keld.Lauridsen@wisconsin.gov

From: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Sent: Tuesday, January 7, 2020 8:14 AM
To: Lauridsen, Keld B - DNR <Keld.Lauridsen@wisconsin.gov>
Subject: Site Investigation Work Plan

Keld – hope all is well. Just wanted to touch base with you to make sure you received our PFAS Site Investigation Work Plan in the mail over the holiday season. Please let me know if you have any questions or concerns.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
Green Bay Operations
Office: 920-438-2233
Cell: 920-639-1548
Fax: 404-654-4858