

Lauridsen, Keld B - DNR

From: Maletzke, Jeff <Jeff.Maletzke@aecom.com>
Sent: Monday, February 3, 2020 8:58 AM
To: Lauridsen, Keld B - DNR
Cc: Mrotek, Melissa (GBY); Cole, Albert
Subject: DNR BRRTS Activity #02-05-583452
Attachments: WDNR submittal 1-31-20.pdf

Keld:

On behalf of GP, please see attached documentation of PCB Soil Excavation/Removal Activities. Thank you.

Jeff Maletzke, PG (WI)
Senior Hydrogeologist, Remediation
Environment Business Line Central Region
D +1-920-406-3110
M +1-920-698-6353
jeff.maletzke@aecom.com

AECOM
2985 South Ridge Road
Suite B
Green Bay, WI 54304, USA
T +1-920-468-1978
aecom.com

Imagine it. Delivered.

[LinkedIn](#) [Twitter](#) [Facebook](#) [Instagram](#)

FORTUNE
WORLD'S MOST
ADMIRED
COMPANIES **2018**
©2018 Time Inc. Used under license.



**Georgia-Pacific
Consumer Operations LLC**

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

January 31, 2020

SUBMITTED VIA EMAIL

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

**Subject: PCB Soil Excavation/Removal Activities
Georgia-Pacific Consumer Operations LLC – Green Bay Broadway Mill
DNR BRRTS Activity # 02-05-583452**

Dear Mr. Lauridsen:

Georgia-Pacific Consumer Operations LLC (GP) is providing the Wisconsin Department of Natural Resources (WDNR) with this documentation of soil excavation/removal and disposal activities completed to remediate PCB impacts near soil boring B-101 at the GP Broadway Mill, located at 1919 South Broadway Street, in the City of Green Bay, Wisconsin. This documentation is being submitted in support of a request for No Further Action (NFA). However, we understand that the Department may not issue an NFA determination until after PFAS sampling is completed in other areas of the site.

Background

Five geotechnical borings (B-101, B-102, B-103, B-104A, and B-105) were completed in January and February 2019 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. A composite sample of the fill material beneath a layer of coal from the coal storage yard was collected for TCLP and PCB sampling required for the landfill disposal of the soils which were expected to be excavated for a proposed mill project. Samples were analyzed for TCLP metals, TCLP VOCs, TCLP SVOCs, and PCBs. The results of this initial sampling indicated the presence of benzene, MEK, Cadmium, and Barium in the TCLP samples and PCBs in one soil sample which led to the submittal of a Release Notification and Release Confirmation Sampling Plan to the WDNR on May 9, 2019.

Confirmation samples were collected on June 17, 2019. The results of the confirmation sampling indicated no detections of benzene and very low levels of cadmium. The detected concentrations of cadmium were below the NR720 RCLs. These results indicated no need for further investigation regarding benzene and cadmium. However, total PCBs were detected in soil samples collected in surficial fill near B-101 at concentrations above the Groundwater Pathway RCL of 9.4 ug/Kg. These results, as well as a sampling plan for an additional investigation was submitted to the WDNR on August 8, 2019.

Based on the detections of PCBs in the initial confirmation sampling, additional soil samples were collected on September 13, 2019 to delineate the extent of PCBs (relative to the Groundwater Pathway RCL). A total of 5 borings (B-101E through B-101I) were completed at the locations shown on Figure 1. No PCBs were detected in any of the additional confirmation samples, thereby establishing the lateral extent of PCBs in the B-101 area defined by sample locations B-101E through B-101I as shown on Figure 1. The vertical limits of PCB impacts were established during previous sampling to be limited to surficial fill as PCBs were not detected in deeper samples (8.5 to 9.5 ft bgs). These results, as well as a work plan to excavate and remove PCB-impacted soil was submitted to the WDNR on November 12, 2019.

Table 1 provides a summary of the analytical data and the regulatory standards for all the soil samples collected. A summary of detected compounds is also shown on Figure 1.

Soil Excavation/Removal Activities

Based on the data discussed above and the workplan submitted to and approved by WDNR, surficial fill and coal within the area defined by sample locations B-101E through B-101I was excavated and disposed at GP Consumer Operations LLC Green Bay West Landfill (Green Bay, WI) on December 10, 2019. The bottom of the coal and fill material in this area is approximately 7.5 feet bgs. Therefore, the excavation was extended to a depth of eight feet bgs. Final dimensions of the excavation were 52 feet by 50 feet by 8 feet deep. A total of 605 cubic yards of material was excavated. Forty-one truckloads of excavated material were transported to the licensed landfill. A separate manifest was completed for each truckload, an example of which is included as Attachment A. A complete set of manifests are on file at GP's Broadway Mill facility.

After excavation, the excavated area was backfilled to within one foot of the original grade with clean sand fill supplied by McKeefry and Sons from the Hylak Sand Pit (3513 Northwood Road, Suamico, WI). The top one foot of the excavated area was capped with ¾-inch crushed gravel supplied by McKeefry and Sons from Pit #3 (W830 Main Laney Drive, Pulaski, WI). Photo-documentation of excavation and backfilling activities is provided as Attachment B.

Based on our previous discussions it is our understanding that completion of this excavation per the approved workplan completes all remedial actions required by the WDNR regarding the PCB-impacted materials and will result in an NFA for the PCB-impacted soils.

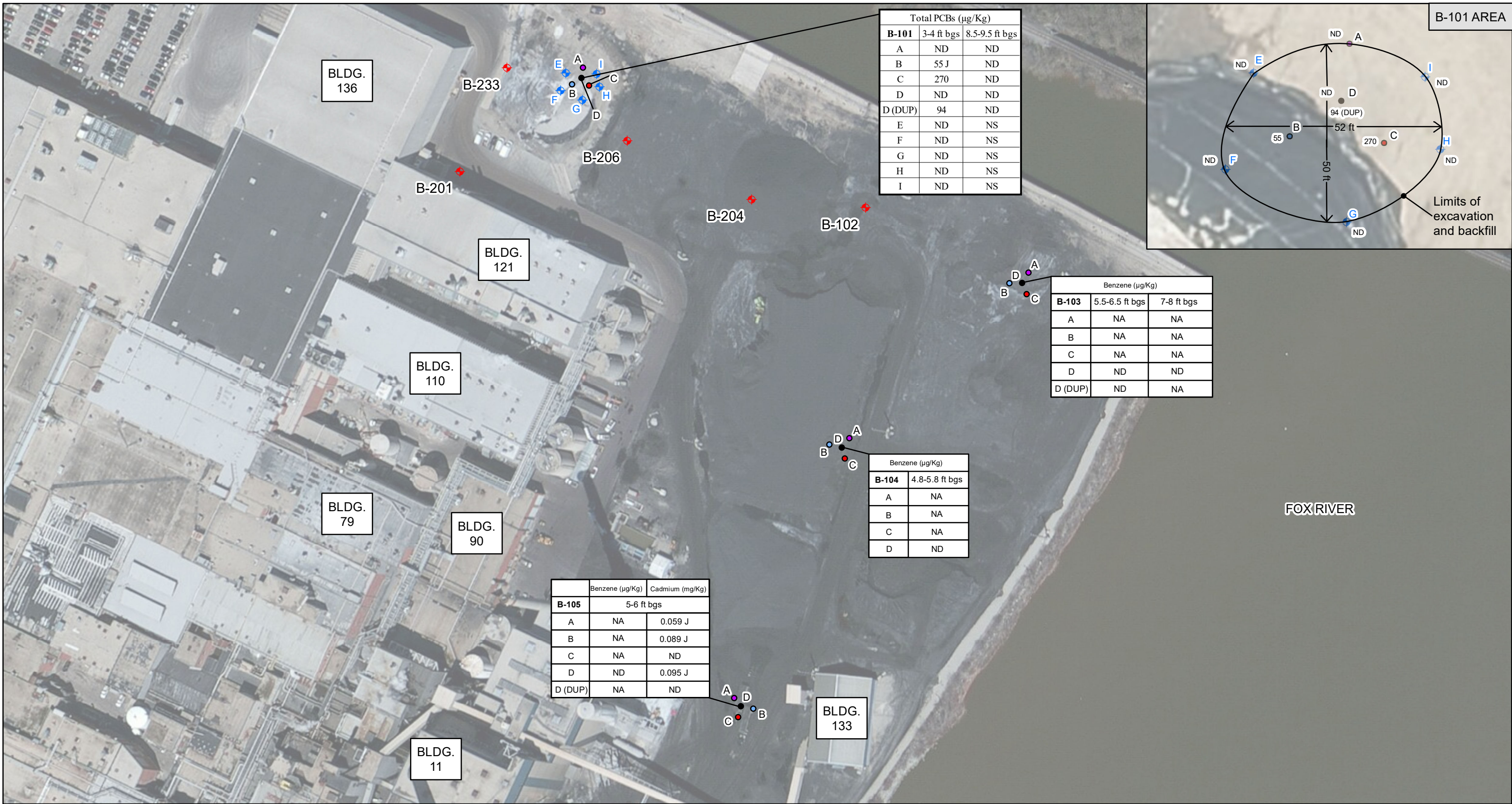
Please contact me at (920) 438-2233 or melissa.mrotek@gapac.com if you have any questions.

Sincerely,



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

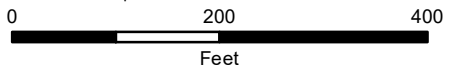
Enclosures: Figure 1 – Confirmation Sampling Locations and Limits of Excavation
Table 1 - Summary of Soil Analytical Results
Attachment A – Example Soil Manifest
Attachment B - Photo Log of Excavation and Backfilling Activities



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
- 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.
 NS= Not Sampled



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

NO.	DATE	BY	REVISION

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: PCB INVESTIGATION			
MACH NAME: SOIL SAMPLING & EXCAVATION/REMOVAL			
DET NAME: CONFIRMATION SAMPLE LOCATIONS & LIMITS OF EXCAVATION			
DR. ASM	CH. JM	DATE: 1/28/20	- - -
AECOM #: 2.01		JOB #: 60614524	
FIGURE 1			REV
DWG #: CONFIRMATION SAMPLE LOCATIONS			

Soil Analytical Data Summary
Project Pace Mill Expansion
Georgia Pacific Broadway Mill - Green Bay, Wisconsin
Project No. 60614524

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

Soil Analytical Data Summary
Project Pace Mill Expansion
Georgia Pacific Broadway Mill - Green Bay, Wisconsin
Project No. 60614524

Parameter	Unit	Sample Depth (ft/bgs)														Residual Soil Contaminant Levels (ch NR 720 Wis. Adm Code)		
			B-103C 7-8	B-103D 5.5-6.5	B-103D DUP 5.5-6.5	B-103D 7-8	B-104A 4.8-5.8	B-104B 4.8-5.8	B-104C 4.8-5.8	B-104D 4.8-5.8	B-105A 5-6	B-105B 5-6	B-105C 5-6	B-105D 5-6	B-105D DUP 5-6	Industrial Direct Contact	Non-Industrial Direct Contact	Protection of Groundwater Quality (DF = 2)
Cadmium, Total	mg/kg										[0.059]	[0.089]	ND	[0.095]	ND	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			ND	ND	ND				ND				ND		7,070	1,600	5.1

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

Attachment A

Example Soil Manifest

NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <i>WJ10006136659</i>	Manifest Document No. <i>120919-08</i>	2. Page 1 of
3. Generator's Name and Mailing Address <i>GP Consumer Operations LLC 1015 S Broadway Green Bay, WI 54304</i>				
4. Generator's Phone <i>(920) 435-8821</i>				
5. Transporter 1 Company Name <i>McGeefry & Sons 82</i>	6. US EPA ID Number <i>NA</i>	A. State Transporter's ID <i>11646</i>		B. Transporter 1 Phone <i>920-822-5275</i>
7. Transporter 2 Company Name	8. US EPA ID Number <i>NA</i>	C. State Transporter's ID		D. Transporter 2 Phone
9. Designated Facility Name and Site Address <i>GP Consumer Operation LLC GB West LT Green Bay, WI 54300 Sec 6-T32N-R20E</i>		10. US EPA ID Number <i>NA</i>		E. State Facility's ID <i>40501650</i> License # <i>2332</i>
				F. Facility's Phone <i>920-438-2190</i>

11. WASTE DESCRIPTION	12. Containers		13. Total Quantity	14. Unit Wt./Vol.
	No.	Type		
a. <i>Non RCRA Impacted Soil - PCB LIPAM</i>	<i>1</i>	<i>DT</i>	<i>17</i>	<i>yd³</i>
b.				
c.				
d.				

G. Additional Descriptions for Materials Listed Above	H. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
DT = Dump Truck Truck # 82

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name <i>Sacquelyn Rameroville</i>	Signature <i>[Signature]</i>	Date Month Day Year <i>12 10 19</i>
17. Transporter 1 Acknowledgement of Receipt of Materials		
Printed/Typed Name <i>Dan White</i>	Signature <i>[Signature]</i>	Date Month Day Year <i>12 10 19</i>
18. Transporter 2 Acknowledgement of Receipt of Materials		
Printed/Typed Name	Signature	Date Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name <i>Richard F. Jones</i>	Signature <i>[Signature]</i>	Date Month Day Year <i>12 10 19</i>
---	---------------------------------	---


NON-HAZARDOUS WASTE GENERATOR TRANSPORTER FACILITY

Attachment B

Photo Log of Excavation and Backfilling Activities

PHOTOGRAPHIC LOG – Soil Excavation/Removal in B-101 Area

Client Name: Georgia-Pacific Consumer Operations, LLC		Site Location: Green Bay Broadway Mill 1919 South Broadway, Green Bay, WI	Project No.: 60614524
Photo No. 1	Date: 12/10/19		
Direction Photo Taken: Northeast			
Description: Soil excavation at B-101 area in progress.			

Photo No. 2	Date: 12/10/19		
Direction Photo Taken: Northeast			
Description: Soil excavation in progress.			

PHOTOGRAPHIC LOG – Soil Excavation/Removal in B-101 Area

Client Name: Georgia-Pacific Consumer Operations, LLC		Site Location: Green Bay Broadway Mill 1919 South Broadway, Green Bay, WI	Project No.: 60614524
Photo No. 3	Date: 12/10/19		
Direction Photo Taken: North			
Description: Limits of soil excavation; 52-foot diameter measured east-west			

Photo No. 4	Date: 12/10/19		
Direction Photo Taken: Northeast			
Description: Limits of soil excavation; 52-foot diameter measured east-west.			

PHOTOGRAPHIC LOG – Soil Excavation/Removal in B-101 Area


Client Name: Georgia-Pacific Consumer Operations, LLC		Site Location: Green Bay Broadway Mill 1919 South Broadway, Green Bay, WI		Project No.: 60614524
Photo No. 5	Date: 12/10/19			
Direction Photo Taken: Northeast				
Description: Limits of soil excavation; 50-foot diameter measured north-south.				

Photo No. 6	Date: 12/10/19			
Direction Photo Taken: East				
Description: Vertical limits of soil excavation measured at 8 feet deep.				

PHOTOGRAPHIC LOG – Soil Excavation/Removal in B-101 Area


Client Name: Georgia-Pacific Consumer Operations, LLC		Site Location: Green Bay Broadway Mill 1919 South Broadway, Green Bay, WI	Project No.: 60614524
Photo No. 7	Date: 12/10/19		
Direction Photo Taken: East			
Description: Vertical limits of soil excavation measured at 8 feet deep.			

Photo No. 8	Date: 12/11/19		
Direction Photo Taken: Northwest			
Description: Initiation of backfilling with clean sand.			

PHOTOGRAPHIC LOG – Soil Excavation/Removal in B-101 Area

Client Name: Georgia-Pacific Consumer Operations, LLC		Site Location: Green Bay Broadway Mill 1919 South Broadway, Green Bay, WI	Project No.: 60614524
Photo No. 9	Date: 12/11/19		
Direction Photo Taken: Northeast			
Description: Continued backfilling of excavation.			

Photo No. 10	Date: 12/11/19		
Direction Photo Taken: Northeast			
Description: Backfilling and compaction of excavation.			

PHOTOGRAPHIC LOG – Soil Excavation/Removal in B-101 Area

Client Name: Georgia-Pacific Consumer Operations, LLC		Site Location: Green Bay Broadway Mill 1919 South Broadway, Green Bay, WI	Project No.: 60614524
Photo No. 11	Date: 12/11/19		
Direction Photo Taken: Northeast			
Description: Compaction of sand backfill.			

Photo No. 12	Date: 12/11/19		
Direction Photo Taken: East			
Description: Compaction of sand backfill.			

PHOTOGRAPHIC LOG – Soil Excavation/Removal in B-101 Area

Client Name: Georgia-Pacific Consumer Operations, LLC		Site Location: Green Bay Broadway Mill 1919 South Broadway, Green Bay, WI	Project No.: 60614524
Photo No. 13	Date: 12/11/19		
Direction Photo Taken: North			
Description: Compaction and grading of gravel top layer (14 inches thick).			

Photo No. 14	Date: 12/11/19		
Direction Photo Taken: Northeast			
Description: Continued placement, grading and compaction of gravel top layer.			

