



November 25, 2020

Georgia-Pacific Consumer Operations, LLC
Attn: Ms. Melissa Mrotek
Environmental Program Manager
1919 South Broadway
PO Box 19130
Green Bay, WI 54307-9130

SUBJECT: No Further Action
GP Broadway Mill Expansion, 1919 South Broadway, Green Bay, WI
BRRTS #: 02-05-583452

Dear Ms. Mrotek:

On November 23, 2020, the Wisconsin Department of Natural Resources (DNR) received the \$350 No Further Action (NFA) review fee accompanying the previously submitted report titled *PCB Soil Excavation/Removal Activities* which requested NFA in writing. DNR has reviewed the report and concurs that the environment has been restored to the extent practicable as provided in ch. NR 708.09, Wis. Adm. Code. The immediate action in response to a discharge has been completed and the Department of Natural Resources is requiring no further action at this time.

During a preliminary geotechnical investigation in January/February 2019, soil samples were collected and analyzed for TCLP metals, TCLP volatile organic compounds (VOCs), TCLP semi-VOCs and total polychlorinated biphenyls (PCBs). Analytical results revealed PCB soil standard exceedances at soil boring B-101 and the presence of cadmium and/or benzene in the TCLP leachate from borings B-102 through B-105. Methyl ethyl ketone (MEK) detected in the TCLP leachate from all soil samples were determined to be a likely laboratory contaminant and no further evaluation was completed for MEK. The attached map (Confirmation Sample Locations & Limits of Excavation; Figure 1; January 28, 2020) shows the site layout and soil sampling locations.

Confirmatory soil sampling was completed in June 2019. PCBs were confirmed to be present in soil at the B-101 location above soil standards whereas benzene and cadmium were not found to be present in soil above the applicable standards. Therefore, benzene and cadmium were no longer considered to be a concern in soil.

Additional soil samples were collected in September 2019 to fully delineate the PCBs in soil at the B-101 location in preparation for excavation of the impacted soil. Based on the complete soil delineation, 605 cubic yards of PCB impacted soil was excavated and properly disposed at a landfill during December 2019. Groundwater was not evaluated as part of this investigation as the deeper soil samples showed no soil exceedances for the parameters of concern.

Low-level contamination may remain in the soil at this site. The concentrations detected in the soil do not require further action at this time, but this soil may require management as a solid waste if it is excavated in the future. The property owner at the time of excavation must determine whether the

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Ms. Melissa Mrotek
No Further Action Letter
GP Broadway Mill Expansion - BRRTS #: 02-05-583452

material is considered solid or hazardous waste and ensure that any storage, treatment or disposal is in compliance with applicable standards and rules. Contaminated soil may be managed in accordance with ch. NR 718, Wis. Adm. Code, with prior DNR approval. It should be noted that a significant amount of coal was found to be present subsurface in the area of the investigation due to the current use of the general area to store coal piles.

We appreciate your efforts to protect and restore the environment at this site. If you have any questions regarding this no further action determination, please contact the Project Manager, Keld Lauridsen in Green Bay at (920) 510-8294 or Keld.Lauridsen@wisconsin.gov.

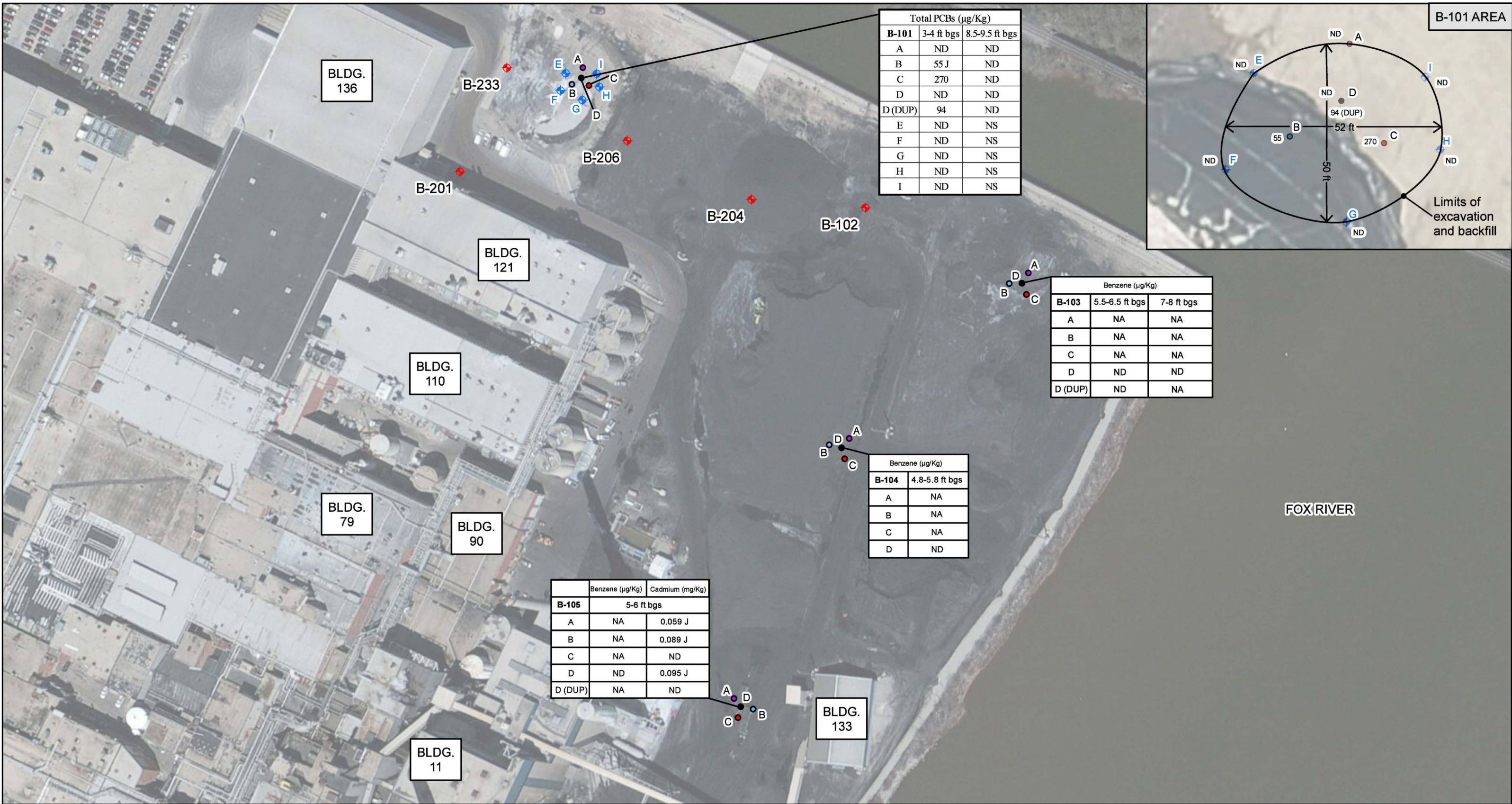
Sincerely,

A handwritten signature in blue ink, appearing to read "T. Nobile", is positioned above the typed name.

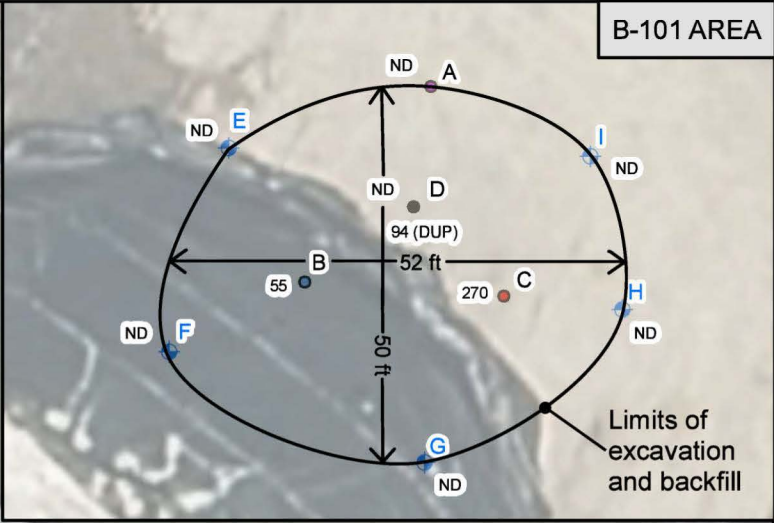
Trevor Nobile, P.G., CPG
Field Operations Director
Remediation & Redevelopment Program

Attachment: Confirmation Sample Locations & Limits of Excavation; Figure 1; January 28, 2020

cc: Jean Romback-Bartels, Secretary's Director, WDNR – Green Bay



Total PCBs (µg/Kg)		
B-101	3-4 ft bgs	8.5-9.5 ft bgs
A	ND	ND
B	55 J	ND
C	270	ND
D	ND	ND
D (DUP)	94	ND
E	ND	NS
F	ND	NS
G	ND	NS
H	ND	NS
I	ND	NS



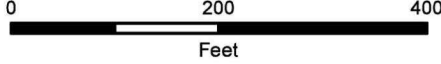
Benzene (µg/Kg)		
B-103	5.5-6.5 ft bgs	7-8 ft bgs
A	NA	NA
B	NA	NA
C	NA	NA
D	ND	ND
D (DUP)	ND	NA

Benzene (µg/Kg)	
B-104	4.8-5.8 ft bgs
A	NA
B	NA
C	NA
D	ND

	Benzene (µg/Kg)	Cadmium (mg/Kg)
B-105		
5-6 ft bgs		
A	NA	0.059 J
B	NA	0.089 J
C	NA	ND
D	ND	0.095 J
D (DUP)	NA	ND

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	 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	
	NO. DATE BY REVISION		FIGURE 1 DWG #: CONFIRMATION SAMPLE LOCATIONS	
			REV	