## Lauridsen, Keld B - DNR

From: Miller, Roger <rmiller@geiconsultants.com>
Sent: Monday, December 16, 2019 1:51 PM

**To:** Lauridsen, Keld B - DNR

Cc: Mrotek, Melissa (GBY); POMERVILLE, JACQUELYN; Killian, Paul

Subject:BRRTS 02-05-584460 - Boiler 6 Soil Removal ScheduleAttachments:Figure 2 - Sample Location (Rev 2019-10-25).pdf; Boiler 6\_Data\_Analysis\_Summary\_TCLP-Total Metals(rev 1).pdf

Keld,

As a follow-up to our teleconference on November 1, 2019, we are emailing to update you on the schedule for the planned soil removal and disposal to facilitate installation of a new boiler foundation in the area of the former Boiler 6 at the Georgia-Pacific Broadway Mill. Gauthier & Sons Construction, Inc., will begin removing the concrete slab early this week and we anticipate they will complete the initial phase of soil excavation later this week on December 19 and 20, 2019. Additional soil removal will likely occur on December 30 and 31, 2019, but may extend into the first few business days of the new year.

Soil will be managed and disposed of consistent with our last discussion and as outlined in the following email. Soil removed for the new boiler foundation installation will be hauled to an appropriately licensed treatment/disposal facility as either characteristic hazardous waste (i.e., soil from around original Sample 2) or solid waste. As discussed, we plan to present the findings and results under the NR 708 No Further Action process based on current information and after construction/soil removal.

We will update you again after soil removal and disposal activities are completed. In the meantime, please contact us with any questions.

Thank you,



ROGER A. MILLER, P.G., C.P.G. Senior Hydrogeologist 920.455.8657 cell: 920.737.6373 3159 Voyager Drive, Green Bay, WI 54311



From: Miller, Roger

Sent: Friday, November 1, 2019 10:35 AM

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

Cc: POMERVILLE, JACQUELYN < JACQUELYN.POMERVILLE@GAPAC.COM >; Mrotek, Melissa (GBY)

<MELISSA.MROTEK@GAPAC.com>; Killian, Paul <pkillian@geiconsultants.com>

Subject: BRRTS 02-05-584460 - Boiler 6 - Sample Location Figure and Tabulated Data - Information for 2PM Call Today

Keld,

For our conference call scheduled today at 2PM, attached are the updated sample location figure and data table for the Boiler 6 project. The purpose of the call is to update you on the project and our current data interpretation including:

- 1) Analytical data indicates a small, localized zone around original Sample 2 for management as characteristic hazardous waste when removed.
- 2) Excavation will involve containerizing the small zone around Sample 2 as characteristic hazardous waste and temporarily storing soil extending out to samples A, C, G, and 5 in roll-offs pending additional waste characterization testing of the excavated material. Sample 5 is also being run for total lead to confirm low levels at this location consistent with all the total lead results besides the original Sample 2.
- 3) Figure 2 shows the revised foundation area. Construction of the new boiler foundation is scheduled to start during the week of 12/9/19.
- 4) Planned reporting under the NR 708 No Further Action process based on current information and after construction/soil removal.

Look forward to our discussion and answering any questions.



ROGER A. MILLER, P.G., C.P.G. Senior Hydrogeologist 920.455.8657 cell: 920.737.6373 3159 Voyager Drive, Green Bay, WI 54311



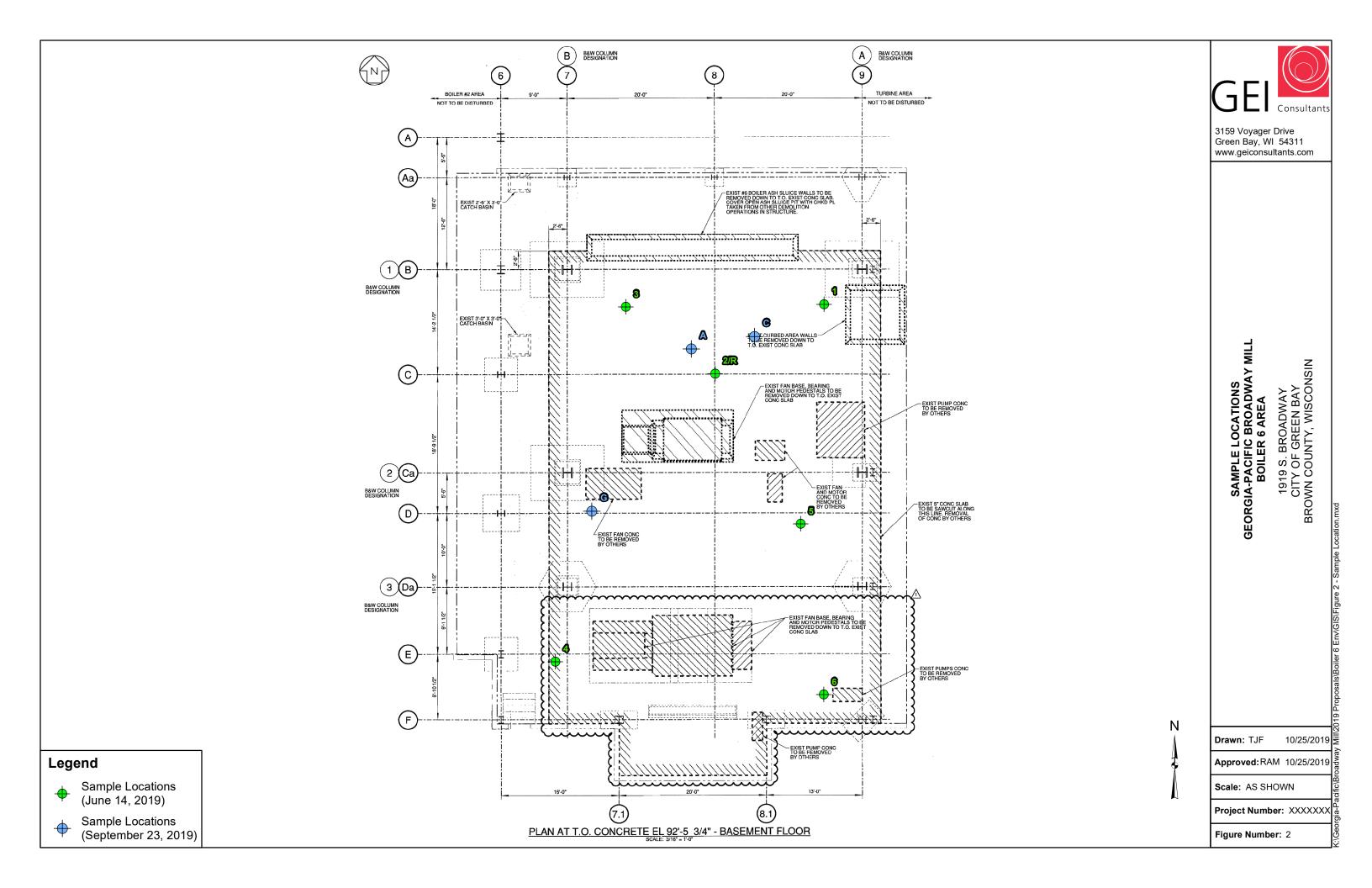


Table 1. Soil Analytical Summary

Broadway Mill Boiler 6 Environmental Assessment

Project No. 1904576

							Location	Sample 1	Sample 2	2R	2R	Sample 3	Sample 4	Sample 5	Sample 6	А	С	G	G
		Federal Regulatory Standards <sup>3</sup>	Wisconsin Regulatory Standards <sup>1,2</sup>				Date	6/14/19	6/14/19	9/23/19	9/23/19	6/14/19	6/14/19	6/14/19	6/14/19	9/23/19	9/23/19	9/23/19	9/23/19
		TCLP	BTV	Non-Industrial	Industrial DC	GW	Depth (ft)	2-3	2-3	3-4	10-12	2-3	2-3	2-3	2-3	2-3	2-3	2-3	10-12
	CAS#			DC		GW	% Solids	92.5	91.6	88.6	83.6	89.5	87.0	87.6	76.8	92.1	90.3	88.5	82.6
TOTAL METAL	DTAL METALS (detected analytes) <sup>4</sup> (mg/kg)																		
Barium	7440-39-3	NA	364	15,300	100,000	164.8			13										
Cadmium	7440-43-9	NA	1	71	985	0.752			0.089										
Chromium <sup>5</sup>	16065-83-1/18540-29-9	NA	NE	100,000/0.301	100,000/6.36	360,000 <sup>6</sup>			7.0										
Lead	7439-92-1	NA	52	400	800	27			<u>640</u> *	2.9	4.8			4.6		1.2	20	1.1	4.9
TCLP METALS	METALS (detected analytes) 4 (mg/L)																		
Barium	7440-39-3	100.0	NA	NA	NA	NA		0.18	0.23			0.21	0.25	0.28	0.68				
Cadmium	7440-43-9	1.0	NA	NA	NA	NA		ND	ND			ND	ND	0.0034	ND				
Lead	7439-92-1	5.0	NA	NA	NA	NA		ND	6.4 ^	ND		ND	0.044	ND	2.0	ND	ND	ND	

< = not detected above method detection limit;

(μg/kg) = micrograms per kilogram; J = concentration between detection limit and reporting limit;

-- = not analyzed;

DC = Direct Contact; BTV = Background Threshold Value;

GW = Groundwater; NA = Not Applicable; TCLP = Toxicity Characteristic Leaching Procedure;

ND = Non Detect;

NE = Not Established

<sup>1</sup> NR 720 RCL = Chapter NR 720, Wisconsin Administrative Code, Residual Contaminant Level

<sup>2</sup>RCLs & BTVs are based on USEPA methodology; presented in WDNR Guidance, Soil RCL Determinations using USEPA Regional Screening Level Web Calculator (RR-890) and summarized in the WDNR's R&R Program RCE Spreadsheet (December 2018).

<sup>3</sup>TCLP Regulatory Standard = EPA regulation referenced in Chapter NR 661, Wisconsin Administrative Code, Hazardous Waste Identification and Listing

 $^4$ Only detected analytes are listed; refer to the laboratory analytical report for a full list of assessed analytes.

5RCLs for chromium reported as Chomium III/Chromium VI; based on property history, it is anticipated that chromium detected on the Property is Chromium III, and as such, sample result was not considered an exceedence of the RCL.

<sup>6</sup>GW Pathway RCL for Chromium III only.

Exceeds the NR 720 Non-Industrial Direct Contact RCL: 100 Exceeds the NR 720 Industrial Direct Contact RCL: 100

Exceeds the NR 720 Groundwater Pathway RCL: 100

Exceeds the BTV: 100\*

Exceeds the TCLP Limit: 100^