



April 8, 2020

Georgia-Pacific Consumer Operations, LLC
Attn: Ms. Melissa Mrotek
1919 South Broadway
Green Bay, WI 54304

SUBJECT: No Further Action
GP Broadway Mill – Boiler 6 Area, 1919 South Broadway, Green Bay, WI
DNR BRRTS Activity # 02-05-584460

Dear Ms. Mrotek:

On March 13, 2020, the Wisconsin Department of Natural Resources (DNR) received a *Request for No Further Action* with the applicable \$350 review fee prepared by GEI Consultants, Inc. on your behalf for the above referenced site. The DNR has reviewed the document 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 DNR is requiring no further action at this time.

In anticipation of the existing boiler being replaced, Georgia-Pacific staff collected soil samples in June 2019 to characterize the soil within the anticipated future area of construction. Soil samples were analyzed for Polychlorinated Biphenyls (PCBs) and Toxicity Characteristic Leaching Procedure (TCLP) for Volatile Organic Compounds (VOCs), Semi-VOCs (SVOCs) and metals. Lead was found in soil to exceed current soil standards and the soil also failed TCLP. The lead contaminated soil determined to be hazardous waste was subsequently excavated and containerized in twelve 55-gallon drums (7,200 pounds) for subsequent treatment and disposal by Tradebe Treatment and Recycling of Wisconsin, LLC in Milwaukee, WI. An additional 56 tons of potentially contaminated soil was excavated, as shown on the attached map (Figure 3; Sample Locations; April 6, 2020), and disposed at Ridgeview RDF in Whitelaw, WI. Additional soil beyond the area of the remedial focus was also excavated and disposed at Ridgeview RDF to allow for future construction activities. Based on the available soil sampling results, no lead contaminated soil above anticipated background concentration remains. Due to the limited vertical extent of lead contamination found in soil, it appears appropriate that groundwater was not investigated for lead.

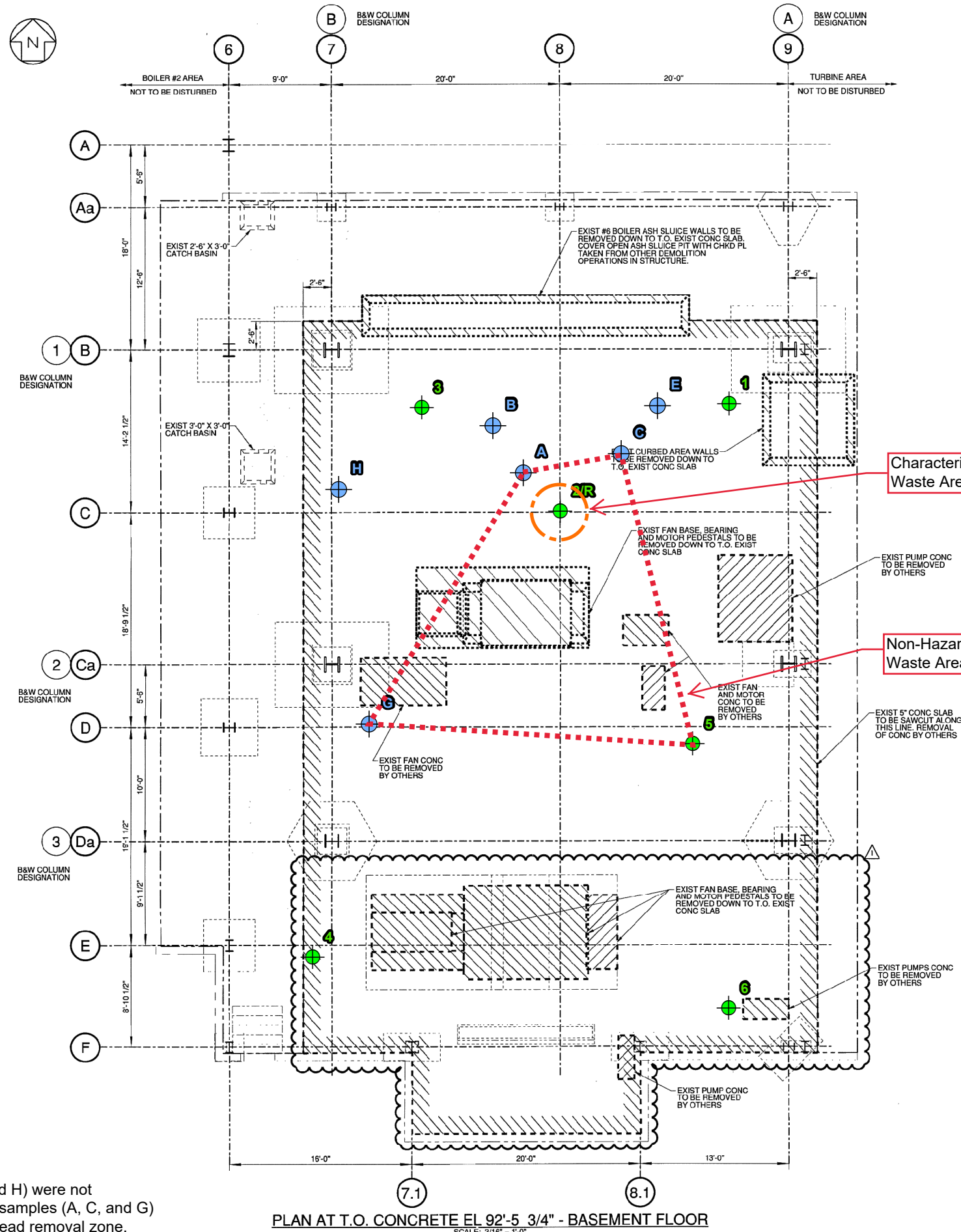
We appreciate your efforts to protect and restore the environment at this site. If you have any questions regarding this No Further Action determination, please contact the Project Manager, Keld Lauridsen in Green Bay at (920) 662-5420 or Keld.Lauridsen@wisconsin.gov.

Sincerely,

Roxanne N. Chronert
Team Supervisor, Northeast Region
Remediation & Redevelopment Program

Attachment: Figure 3; Sample Locations; April 6, 2020

cc. Roger Miller, GEI Consultants (rmiller@geiconsultants.com)
Jacquelyn Pomerville, GP Consumer Operations LLC (Jacquelyn.Pomerville@gapac.com)



Legend

- Sample Locations (June 14, 2019)
- Sample Locations (September 23, 2019)
- Non-Hazardous Solid Waste Area (excavated to depths of 3 to 4 feet)
- Characteristic Hazardous Waste Area (excavated to depths of 3 to 4 feet)

Note:
The outer ring samples (B, E, and H) were not analyzed because the inner ring samples (A, C, and G) were sufficient to define the soil lead removal zone.

**SAMPLE LOCATIONS
GEORGIA-PACIFIC BROADWAY MILL
BOILER #6 AREA**
1919 S. BROADWAY
CITY OF GREEN BAY
BROWN COUNTY, WISCONSIN

Drawn: TJF	4/6/2020
Approved: RAM	4/6/2020
Scale: AS SHOWN	
Project Number: 1904576	
Figure Number: 3	