

Lauridsen, Keld B - DNR

From: Mrotek, Melissa (GBY) <MELISSA.MROTEK@GAPAC.com>
Sent: Friday, June 28, 2019 8:14 AM
To: Lauridsen, Keld B - DNR
Cc: Champion, Traylor; Davis, Michael (GP Law)
Subject: Request for Additional Information - GP Broadway Mill Expansion
Attachments: 20190628080307269.pdf

Dear Mr. Lauridsen,

Per your request dated May 8, 2019, please see the attached response to request for additional information for GP Broadway Mill Expansion, 1919 South Broadway, Green Bay, WI, BRRTS number is pending.

Please feel free to contact me if there are any additional questions.

Thanks,

Melissa Mrotek

Environmental Program Manager
Georgia-Pacific Consumer Operations LLC
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June 28, 2019

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

Re: Request for additional information
GP Broadway Mill Expansion, 1919 South Broadway, Green Bay, WI
BRRTS number is pending

Dear Mr. Lauridsen:

On April 16, 2019, Mr. Jeff Maletzke of AECOM provided notification on behalf of Georgia-Pacific Consumer Operations LLC's Green Bay Broadway mill (GP) located at 1919 South Broadway, Green Bay, Wisconsin to Wisconsin Department of Natural Resources (Department) of soil sampling results for Polychlorinated Biphenyls (PCBs) and Toxicity Characteristic Leaching Procedure (TCLP) results for metals and select Volatile Organic Compounds (VOCs). The samples were taken from a portion of the Broadway Mill in connection with a proposed construction project at the mill. AECOM is in the process of preparing a workplan to further evaluate the area of the proposed mill expansion.

Following that notification, the Department submitted an information request (Request) to GP asking for information regarding per- and polyfluoroalkyl substances (PFAS). The Request was dated May 8, 2019 and asked for a response within 60 days, or by July 8, 2019.

GP notes that the Department's request is not based on any indication that PFAS chemistries have ever been manufactured or applied in the manufacturing process over the history of the Green Bay mill. In fact, GP's research has concluded that PFAS chemistry has never been intentionally added in the manufacturing process at the Green Bay mill.

The Department's requests are reproduced below, and GP's responses follow:

1. Describe the use and manufacture of PFAS or PFAS-containing materials at the Facility from the receipt of the material to the final use, sale or disposal of PFAS or PFAS-containing materials. Include in that description the information on all entities responsible for its manufacture and use; the years involved in its manufacture and use; what it was used to manufacture; whether any product containing PFAS was used or tested at the Facility; the areas of the Facility where it was manufactured and used; and whether it was emitted from any air emission sources.

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Response: GP has never manufactured or intentionally added PFAS or PFAS-containing materials (collectively, PFAS) as part of its paper manufacturing process in Green Bay. The mill has utilized at times small volumes of cleaners or other maintenance type chemicals, some of which may have contained PFAS in very low amounts.

GP does utilize large quantities of recycled fiber in the production of its product line. Recycled stock includes, among other things, tissue and towel products, office paper, containerboard and corrugated boxes. Some of this recycled stock may from time to time include trace amounts of PFAS, which could end up in the production process. While product with a high percentage of recycled content may contain trace amounts of Perfluoroalkyl substances, all such products has been determined to be safe. In addition, no PFOA or PFOS has been detected in the product.

GP also had a tank of firefighting foam at some point at the mill. The foam was recently disposed of offsite in metal drums and was processed as waste to energy. The foam was not tested for PFAS and to the best of GP's knowledge the foam was never employed for any purpose.

Additional information is provided in response to the other questions, below.

2. Describe, using generic and trade names, the materials containing PFAS that were transported to or from, disposed of, stored, produced, used, handled, managed, or processed at or related to the Facility. The description should include the physical form (solid, liquid, gas) of any materials and the type of container used to transport, store, produce, use, handle, manage, or process the PFAS.

Response: As explained in response to Question 1, above, GP never produced, intentionally processed or knowingly disposed of PFAS at its Green Bay operations. PFAS may have been a low quantity component of some maintenance type chemicals, see the table below.

Chemical Name	Use	Material Type	Container Type
LPS Electro Contact Cleaner	Currently used	Liquid	Aerosol Can
3M Novec 7100 Engineered Fluid	No longer used	Liquid	Plastic drums or Totes
Pow-R-Wash CZ*	Currently used	Liquid	Aerosol Can
Zonyl FSN Fluorosurfactant	No longer used	Information no longer available	
Braided Graphite Packing (Styles 1627/1627D)*	Currently used	Solid	Box

* Products have been reformulated to no longer contain PFAS components.

3. Describe the transportation to or from, production, disposal off, storage, use, handling, management, and processing of PFAS-containing material related to the Facility. Include in each description where and in what process at the Facility, the transportation to or from, disposal storage, use, handling, management. and processing of PFAS-containing material occurred at the Facility. *E.g.*, the material was disposed of in landfill, drained to soil sewer drain, etc. If the point of transportation to or from, production of, disposal of, storage, use, handling, management, or processing of PFAS-containing material changed over time, please provide dates of such changes and what changes were made.

Response: See response to question 1. As a general matter, maintenance type chemicals were purchased from suppliers who shipped them to the Green Bay mill via commercial carrier. Based on information available today, these are all believed to have been shipped in containers, never in bulk. These Specialty Chemicals were stored indoors, on shelves or in storage containers. The table listed under question 2, above, contains a list of chemicals which may have contained small amounts of PFAS:

Chemical Name	Use	Area Used	Use Type	Disposal
LPS Electro Contact Cleaner	Currently used	Maintenance	Cleaning / degreasing of electrical cabinets	Hazardous waste**
3M Novec 7100 Engineered Fluid	No longer used	Process	Cleaning / degreasing of felts/wires on paper machine	Material was 100% volatile, if material was disposed of, it would have been disposed of as hazardous waste
Pow-R-Wash CZ*	Currently used	Maintenance	Cleaning / degreasing of elevator electrical cabinets and elevator door switches	Hazardous waste**
Zonyl FSN Fluorosurfactant	No longer used	Information no longer available		
Braided Graphite Packing (Styles 1627/1627D)*	Currently used	Maintenance	Pump packing material to seal	General trash disposed of in landfill

* Products have been reformulated to no longer contain PFAS components.

** Material was contained in an aerosol can. Facility has an aerosol can puncturing device that would have emptied the aerosol and remaining contents into a hazardous waste collection drum and shipped out as hazardous waste. Punctured cans are sent to a metal recycling facility.

4. Estimate the amounts of PFAS-containing materials that were transported to or from, disposed of, stored, produced, handled, managed, or processed at or related to the Facility.

Response: See table below.

Chemical Name	Use	Area Used	Estimated Usage
LPS Electro Contact Cleaner	Currently used	Maintenance	Maintenance chemical usage not tracked. Estimated to be < 10 lbs/year since 1996.
3M Novec 7100 Engineered Fluid	No longer used	Process	No indication of actual use.
Pow-R-Wash CZ*	Currently used	Maintenance	Approved for use at facility in 2011. Reformulated in 2015 to no longer contain PFAS components. For usage from 2011 through 2015, estimated to be < 10lbs/year.
Zonyl FSN Fluorosurfactant	No longer used	Information no longer available	
Braided Graphite Packing (Styles 1627/1627D)*	Currently used	Maintenance	Approved for use at facility in 2011. Reformulated in 2014 to no longer contain PFAS components. For usage from 2011 through 2014, estimated to be < 10lbs/year.

* Products have been reformulated to no longer contain PFAS components.

5. Identify which part of GP's operations, including storage, involving PFAS or PFAS-containing materials, generated waste, including but not limited to wastes resulting from spills of liquid materials and wastes generated by cleaning and maintenance of equipment, inventory cleanout, off-specification determined wastes and machinery. Include locations where the waste was generated and stored, and an estimation of the volume or mass of the waste generated and stored.

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Response: GP stored the cleaners and other chemicals listed in response to Questions 2 through 4 above, indoors, on shelves or in chemical containments. See the table in response to Question 3 for disposal of wastes.

6. Identify releases of PFAS or PFAS-containing materials and describe the methods used to clean up the releases including but not limited to:
 - a. The types of materials spilled,
 - b. The media onto or into which the spill occurred,
 - c. The materials used to clean up those spills,
 - d. The methods used to clean up those spills, and
 - e. Where the materials used to clean up those spills were disposed of.

Response: GP has no knowledge of any such releases of PFAS at the Broadway Mill during the time it has owned and operated the facility.

7. Describe the cleaning and maintenance of equipment and machinery involved in PFAS operations, including but not limited to:
 - a. The types of materials used to clean and maintain this equipment/machinery,
 - b. The monthly or annual quantity of each such material used,
 - c. The disposition of those materials used in cleaning equipment, and
 - d. Where the materials are/were disposed of.

Response: The term "PFAS operations" is vague in the context of mill operations described above. PFAS was never intentionally utilized as a component or input of the papermaking process in Green Bay. Therefore, there was no cleaning and maintenance of equipment and machinery involved in PFAS operations. However, maintenance type chemicals that may contain small amounts of PFAS were used for cleaning and degreasing purposes. See the table in response to Question 3 above.

8. Was there ever a spill, leak, release, or discharge of PFAS into any subsurface disposal system or floor drain inside or under the buildings within the Facility, or that may have migrated from the Facility? If so, identify:
 - a. Where the disposal system or floor drains were located,
 - b. Whether the disposal system or floor drains were connected to pipes,
 - c. Where such pipes were located and emptied,
 - d. Whether such pipes ever leaked or in any way released the substances into the environment.

Response: GP has no knowledge of any such spills, leaks, releases or discharges of PFAS at the Broadway Mill during the time it has owned and operated the facility.

Sincerely,



Melissa Mrotek

Environmental Program Manager – Green Bay Operations
Georgia-Pacific Consumer Operations LLC